### EXECUTIVE SUMMARY - ENFORCEMENT MATTER

Page 1 of 7

**DOCKET NO.:** 2007-0493-AIR-E **TCEQ ID:** RN100542281 **CASE NO.:** 33070

RESPONDENT NAME: Equistar Chemicals, LP

ORDER TYPE:		
X_1660 AGREED ORDER	FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING SOAH HEARING
FINDINGS DEFAULT ORDER	_SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER
AMENDED ORDER	_EMERGENCY ORDER	
CASE TYPE:		
XAIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL AND HAZARDOUS WASTE
PUBLIC WATER SUPPLY	PETROLEUM STORAGE TANKS	OCCUPATIONAL CERTIFICATION
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION
TYPE OF OPERATION: Chemical manufactories of the Significant Matters: The E, regarding this facility location.  INTERESTED PARTIES: No one other the COMMENTS RECEIVED: The Texas Region Contacts and Mailing List:  TCEQ Attorney/SEP Coordinated TCEQ Enforcement Coordinated Bryan Sinclair, Enforcement Division Respondent: Mr. Don Holloway, In Channelview, Texas 77530 Mr. Denny W. Wiseman, Plant Material Mate	_ No re are no complaints. There is one pending enforcen an the ED and the Respondent has expressed an interister comment period expired on March 10, 2008. Nor: Ms. Melissa Keller, SEP Coordinator, Enforcement: Mr. Terry Murphy, Enforcement Division, Enforcement	nent action, Docket Number 2007-1230-AIR-rest in this matter.  No comments were received.  ent Division, MC 219, (512) 239-1768 ement Team 4, MC 149, (512) 239-5025; Mr.  LP, 8280 Sheldon Road, Building 1,

#### **RESPONDENT NAME:** Equistar Chemicals, LP **DOCKET NO.: 2007-0493-AIR-E**

#### VIOLATION SUMMARY CHART: CORRECTIVE ACTIONS VIOLATION INFORMATION PENALTY CONSIDERATIONS TAKEN/REQUIRED **Corrective Actions Taken:** Type of Investigation: Total Assessed: \$228,720 Complaint The Executive Director recognizes that the Total Deferred: \$45.742 X Routine Respondent has implemented the Enforcement Follow-up X Expedited Settlement following corrective measures at the Plant: Records Review Financial Inability to Pay a. By March 29, 2007, retrained employees Date(s) of Complaints Relating to this on oversight of the continuous monitoring Case: None SEP Conditional Offset: \$91,489 recorder on the Methanol Skid (ECULR2MEOH); Date of Investigation Relating to this Total Paid to General Revenue: \$91,489 Case: December 13, 2006 and January 29, b. By April 19, 2006, reviewed with its Site Compliance History Classification 2007 personnel the proper procedures for the High X Average Poor daily inspection of the fuel dispensing Date of NOV/NOE Relating to this Case: facilities; February 27, March 20, and April 9, 2007 Person Compliance History Classification (NOE) High X Average Poor c. By October 26, 2006, provided proper emissions control for waste materials and Background Facts: These were routine Major Source: X Yes No reviewed with its personnel the proper investigations. procedures for waste handling; Applicable Penalty Policy: September 2002 AIR d. By April 19, 2006, reviewed with its personnel the restrictions on engine 1) Failed to demonstrate the use of a operating hours; continuous monitoring recorder on the Methanol Skid (ECULR2MEOH). e. By April 19, 2006, reviewed with its Specifically, the Respondent was required personnel the proper record keeping to continuously monitor the emissions requirements for the start and stop time for control device for the Skid with a recorder, diesel engines; but the Respondent reported that the records from July 11, 2005 through f. On January 18, 2006, installed a steam September 17, 2005 were discarded stripper upstream of the ECUABEAST [Federal Operating Permit ("FOP") Obio-treatment unit that eliminated the 02181, Special Terms and Conditions further need to test the unit for VOC ("STC"), 1.A., 30 TEX. ADMIN. CODE §§ reduction efficiency; 101.20(2) and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § g. By November 19, 2007, in order to 63.127(b)(2), and Tex. Health & Safety address the untimely flare analyzer CODE § 382.085(b)]. calibrations conducted on Flares 607 and 1701, resolved calibration gas issues with 2) Failed to perform daily inspections of the supplier; the fuel dispensing facilities. Specifically, the Respondent reported that, from March h. On November 14, 2006, provided 3 through March 5, 2006, it failed to additional personnel training on the perform the required daily inspections of regulatory requirements of open-ended the Stage II vapor recovery system for lines in VOC service; defects [FOP O-02181, STC 6.C.iv., 30 TEX. ADMIN. CODE §§ 115.244 and i. By March 27, 2006, replaced the open-122.143(4), and TEX. HEALTH & SAFETY ended lines discovered on January 12 and CODE § 382.085(b)]. March 27, 2006; 3) Failed to provide proper emissions j. By June 11, 2006, decreased nitrogen control for waste material. Specifically, flow and reapplied clearing activities at a the Respondent reported that, twice on slower pace in order to maintain the

February 27, once on August 27, 2006, it

## RESPONDENT NAME: Equistar Chemicals, LP DOCKET NO.: 2007-0493-AIR-E

placed volatile organic compound ("VOC") liquids, residuals from a transport vessel transfer operation, into portable containers that were not vaportight [FOP O-02181, STC 1.A. and 6.B.ii., 30 Tex. Admin. Code §§ 115.212(a)(3)(A)(ii) and 122.143(4), and Tex. Health & Safety Code § 382.085(b)].

- 4) Failed to comply with restrictions on engine operating hours in an ozone nonattainment area. Specifically, the Respondent reported that, on four occasions from October 19 through November 9, 2005, it conducted testing or maintenance on two diesel engines (EUTP803A and EUTP803B) during the restricted hours of 6 a.m. to noon [FOP O-02181, STC 1.A. and 7.A., 30 TEX. ADMIN. CODE §§ 117.206(i) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
- 5) Failed to record the start and stop times of a diesel engine operating in an ozone nonattainment area. Specifically, the Respondent reported that it failed to record those times on November 17, 2005 for diesel pump EUTEN1 [FOP O-02181, STC 1.A. and 7.E., 30 Tex. ADMIN. CODE §§ 117.219(f)(10) and 122.143(4), and Tex. Health & Safety Code § 382.085(b)].
- 6) Failed to demonstrate VOC reduction efficiency for the ECUABEAST biotreatment unit. Specifically, this unit was in operation since 1997, and was required to have its reduction efficiency demonstrated by December 31, 2002, but the Respondent failed to make that demonstration [FOP O-02181, STC 1.A., 30 Tex. ADMIN. CODE § 115.144(4)(A), and Tex. Health & Safety Code § 382.085(b)].
- 7) Failed to timely conduct flare analyzer calibrations. Specifically, the Respondent reported that it was required to perform initial flare analyzer calibrations on Flares 607 and 1701 (highly reactive volatile organic compounds abatement devices) by January 1, 2006, but did not perform those calibrations until June 16, 2006 [30 Tex. ADMIN. CODE § 115.725(d)(1) and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 8) Failed to comply with the requirements of malfunction reporting for the wastewater steam stripper (EUTT8802). Specifically, in its report for the period

required heat input to the Poly Butadiene unit flare at a value greater than 300 Btu/scf;

- k. By September 13, 2006, implemented new record keeping practices on a more frequent weekly basis detailing all corrective actions made to the continuous monitoring system for the Poly Butadiene unit flare;
- l. By June 28, 2006, conducted a multipoint calibration on the Poly Butadiene unit flare analyzer;
- m. On April 16, 2007, submitted an update for FOP O-02177 to include EPN MPBDM3219;
- n. By October 27, 2005, conducted sampling and gathered information to completely document the VOC water separator exemption criteria;
- o. By February 19, 2006, repaired the leaking valve that had been on the schedule for repair during the December 22, 2005 to February 1, 2006 shutdown;
- p. Revised FOP O-02178 on April 3, 2006, to include Permits by Rule ("PBR") claimed during the year 2000;
- q. Removed the vent condenser on tank TK-2810 and rerouted emissions to the IPOH Flare on April 27, 2007 and authorized those emissions via PBR;
- r. Completed the installation of rupture discs and pressure gauges on three safety relief valves (EPN F28E00) in the Styrene Maleic Anhydride Unit by February 17, 2006;
- s. Submitted a request to the TCEQ on September 20, 2006 to amend NSRP 24677 to address emissions and representations for Tote EPN 28E37;
- t. Obtained an alteration to NSRP No. 24677 on December 6, 2005 that allows closed purge cumene sampling;
- u. Provided for additional personnel oversight of Heater MSMHT2801B's fuel flow continuous recorder by September 18, 2006; and
- v. Replaced the filter on Dust Collector EPN28E29 on August 15, 2006.

# RESPONDENT NAME: Equistar Chemicals, LP DOCKET NO.: 2007-0493-AIR-E

April 1 to September 30, 2006, the Respondent reported that, on June 25, 2006, and between July 17 and August 7, 2006, seven stripper column malfunctions occurred. However, the Respondent failed to state the cause of the malfunctions and failed to state what actions were taken to minimize emissions [40 CFR § 63.10(d)(5)(i), Tex. ADMIN. CODE § 101.20(2), and Tex. Health & Safety Code § 382.085(b)].

- 9) Failed to equip open ended lines with a cap, blind flange, plug, or a second valve. Specifically, the Respondent reported that it found the following noncompliant, openended lines: one on the main flare header, three on other lines in VOC service, and eight others on lines in hazardous air pollutant service. These were found on November 15, 2005, February 13, 2006, and August 27, 2006, respectively, and all were provided with caps or plugs within a day of their discovery [FOP O-02181, STC 1.A. and 22., New Source Review Permit ("NSRP" 2128, Special Condition ("SC") 8.E., 30 TEX. ADMIN. CODE §§ 101.20(1), 101.20(2), 115.352(4), 116.115(c), and 122.143(4), 40 CFR §§ 60.482-6(a)(2) and 63.167(a)(1), and TEX. HEALTH & SAFETY CODE § 382,085(b)].
- 10) Failed to cap four open-ended lines. Specifically, the Respondent discovered 3 open-ended lines on January 12, 2006, and 1 open-ended line on March 27, 2006 [30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSRP 22779, SC 8.E., FOP O-02177, STC 1.A. and 10., and Tex. Health & Safety Code § 382.085(b)].
- 11) Failed to operate the flare within the required heat input of 300 British thermal units per standard cubic foot ("Btu/scf"). Specifically, the heat content of the combusted gas in the Poly Butadiene unit flare fell below 300 Btu/scf for six minutes on November 30, 2005, twenty-two minutes on October 21, 2005, one minute on March 6, 2006, and two minutes on June 11, 2006 [30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSRP 22779, SC 6.A., FOP O-02177, STC 1.A. and 10., and Tex. Health & Safety Code § 382.085(b)].
- 12) Failed to report corrective actions within the required time frame.

  Specifically, the Respondent failed to complete Highly Reactive Volatile Organic Compound ("HRVOC") corrective action reports for the Poly Butadiene unit flare

#### **Ordering Provisions:**

- 1) The Order will require the Respondent to implement and complete a Supplemental Environmental Project (SEP). (See SEP Attachment A)
- 2) The Order will also require the Respondent to:
- a. Within 30 days after the effective date of this Agreed Order, submit a corrected malfunction report for the seven wastewater steam stripper (EUTT8802) malfunctions that occurred on June 25, 2006, and between July 17 and August 7, 2006;
- b. Within 30 days after the effective date of this Agreed Order, either obtain authorization to increase emissions from tote EPN 28E37, or cease unauthorized emissions from that tote until such time that appropriate authorization is obtained;
- c. Within 30 days after the effective date of this Agreed Order, implement improvements to designs, operations, and/or maintenance practices that address the root cause of the failure to control visible emissions from Dust Collector EPN28E29; and
- d. Within 45 days after the effective date of this Agreed Order, submit written certification and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 2.a. through 2.c.

## **RESPONDENT NAME:** Equistar Chemicals, LP

**DOCKET NO.:** 2007-0493-AIR-E

within the required time frame on six occasions from March 29 to July 18, 2006 [30 Tex. Admin. Code §§ 115.726(d)(3) and 122.143(4), FOP O-02177, STC 1.J.(ii), and Tex. Health & Safety Code § 382.085(b)].

- 13) Failed to calibrate the Poly Butadiene unit flare analyzer. Specifically, the Respondent failed to conduct initial and first quarter multipoint calibration of the flare analyzer for HRVOCs from January 1 to June 28, 2006 [30 Tex. Admin. Code §§ 115.725(d)(2) and 122.143(4), FOP O-02177, STC No. 1J(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
- 14) Failed to obtain authorization for emissions sources and their associated emissions prior to operation. Specifically, Emission Point Number ("EPN") MPBDM3219 had been operating but was misrepresented in FOP O-02177 in an incorrect location [30 Tex. ADMIN. CODE § 122.121 and TEX. HEALTH & SAFETY CODE §§ 382.085(b) and 382.054].
- 15) Failed to comply with permitted emissions limits. Specifically, emissions for the year 2005 at the Mid API Separator (EPN 32E06) were 4.6 tons of VOC. The authorized emissions limit for emissions under the permit is 2.2 tons per year [30 TEX. ADMIN. CODE §§ 116.115(b)(2)(F) and 122.143(4), NSRP 49120, SC 1., FOP O-02177, STC 10., and TEX. HEALTH & SAFETY CODE § 382.085(b)].
- 16) Failed to maintain sufficient records to demonstrate continuous compliance with VOC water separator exemption criteria [30 Tex. Admin. Code §§ 115.136(a)(1) and 122.143(4), FOP O-02177, STC 1.A., and Tex. Health & Safety Code § 382.085(b)].
- 17) The Respondent failed to repair a leaking valve during a scheduled shutdown. Specifically, the Respondent failed to make scheduled repairs of a valve during the scheduled shutdown from December 22, 2005 through February 1, 2006 [30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSRP 22779, SC 8.I., FOP O-02177, STC 1.A. and 10., and TEX. HEALTH & SAFETY CODE § 382.085(b)].
- 18) Failed to include PBR claims in a FOP. Specifically, the Respondent reported that it failed to include the following Unit ID numbers, authorized under PBR during the year 2000, in its

# **RESPONDENT NAME:** Equistar Chemicals, LP **DOCKET NO.:** 2007-0493-AIR-E

FOP: MSMTK2804A, MSMTK2804B, MSMTK2812, MSMTK2801, MSMTK2801, MSMTK2803, MSMTK2811, MSMTK2802, MSMDM2801, MSMDM2805, MSMDM2802, MSMTK2824, and MSMFG [FOP O-02178, General Terms and Conditions, 30 Tex. Admin. Code § 122.132(a), and Tex. Health & Safety Code § 382.085(b)].

- 19) Exceeded permitted emissions limits for tank TK-2810. Specifically, the permit limits VOC emissions from that tank to 0.04 pounds per hour ("lbs/hr") and less than 0.01 tons per year ("tpy"), but the Respondent reported the VOC emissions from the tank at 4.2 lbs/hr and 14 tpy since July 15, 2005. In addition, the Respondent reported that it had failed to achieve the required 90% control efficiency on the vent condenser on that tank [FOP O-02178, STC, 1.A. and 10., NSRP 24677, SC 1., 30 TEX. ADMIN. CODE §§ 115.112(a)(3), 116.115(c), and 122.143(4), and Tex. Health & Safety Code § 382.085(b)].
- 20) Failed to install rupture discs and pressure gauges on three safety relief valves (EPN F28E00) in the Styrene Maleic Anhydride Unit [FOP O-02178, STC 10., NSRP 24677, SC 11.F. and 13., 30 Tex. ADMIN. CODE §§ 116.115(c) and 122.143(4), and Tex. HEALTH & SAFETY CODE § 382.085(b)].
- 21) Failed to accurately represent operating temperatures for tote EPN 28E37 in the permit representations. Specifically, subsequent to the permit representation of the tote's temperature, the Respondent elected to represent a higher temperature without amending the permit [FOP O-02178, STC 10., 30 Tex. Admin. Code §§ 116.116(b)(1) and 122.143(4), and Tex. Health & Safety Code § 382.085(b)].
- 22) Failed to perform closed loop cumene sampling. Specifically, the permit requires closed loop sampling, and on six occasions from July 20, 2005 through December 5, 2005, the Respondent reported it did not perform closed loop sampling [FOP O-02178, STC 10., NSRP 24677, SC 9.C., 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b)].
- 23) Failed to maintain continuous records of fuel flow for Heater MSMHT2801B. Specifically, on April 8 and 9, 2006, the Respondent reported that the record of

# **RESPONDENT NAME:** Equistar Chemicals, LP **DOCKET NO.:** 2007-0493-AIR-E

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flow was not kept for fifteen 15-minute periods [FOP O-02178, STC 1.A., 30 Tex. ADMIN. CODE §§ 117.213(a) and 122.143(4), and Tex. Health & Safety CODE § 382.085(b)].	
24) Failed to prevent visible emissions from Dust Collector EPN28E29.  Specifically, the Respondent reported that the dust collector experienced 100% opacity for approximately ten minutes on August 15, 2006 [FOP O-02178, STC 3., 30 Tex. Admin. Code §§ 111.111(a)(1)(B) and 122.143(4), and Tex. Health & Safety Code § 382.085(b)].	
	Additional ID No(s) : HG0033

Additional ID No(s).: HG0033B

# Attachment A Docket Number: 2007-0493-AIR-E

#### SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent: Equistar Chemicals, LP

Payable Penalty Amount: One Hundred Eighty-Two Thousand Nine Hundred Seventy-

**Eight Dollars (\$182,978)** 

**SEP Amount:** Ninety-One Thousand Four Hundred Eighty-Nine Dollars

(\$91,489)

Type of SEP: Pre-approved

Third-Party Recipient: Houston-Galveston AERCO's Clean Cities/Clean Vehicles

**Program** 

Location of SEP: Harris County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

#### 1. Project Description

#### A. Project

The Respondent will contribute to Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program in Harris County. The contribution will be used in accordance with the *Supplemental Environmental Project Agreement between the Houston-Galveston AERCO and the Texas Commission on Environmental Quality*. SEP monies will be used to aid local school districts and area transit agencies in reaching local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP monies will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. Those SEP monies will be used exclusively by the school districts and transit agencies as supplements to meet the local match requirements of the EPA. SEP monies will be used to pay for the cost of replacing older diesel buses with alternative fueled or clean diesel buses. The old buses will be permanently retired and only sold for scrap. The schools and transit agencies will also use the SEP monies to retrofit more buses to reduce emissions. Houston-Galveston AERCO will send the TCEQ verification in the form of paid invoices and other documentation to show that the retrofits were completed. Retrofit technologies include particulate matter traps, diesel particulate matter filters, NOx reduction catalyst technology in combination with diesel particulate filters, and other emission control technologies that are developed and approved by EPA or the California Air Resources Board.

The Respondent certifies that there is no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

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#### B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

#### C. <u>Minimum Expenditure</u>

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

#### 2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Houston-Galveston Area Council Houston-Galveston AERCO P.O. Box 22777 Houston, Texas 77227-2777

#### 3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division Attention: SEP Coordinator, MC 219 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

#### 4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to "Texas Commission on Environmental Quality" and mailed to:

\*\*\*

Equistar Chemicals, LP Agreed Order - Attachment A

> Texas Commission on Environmental Quality Financial Administration Division, Revenues Attention: Cashier, MC 214 P.O. Box 13088 Austin, Texas 78711-3088

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

#### 5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

#### 6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

#### 7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

Relian Davision 2 (Co.	=	Calculation	n Worksheet (F	PCW)	
Policy Revision 2 (Sep	tember 2002)			PCW Revis	sion March 19, 2007
DATES Assigned PCW		g 22-Mar-2007	<b>EPA Due</b> 24-Nov-2007		
RESPONDENT/FACILITY	INFORMATION				
\$20,00,00,00,000,000,000,000,000,000,000	Equistar Chemicals, LP				
Reg. Ent. Ref. No.					
Facility/Site Region	12-Houston		Major/Minor Source	Major	
CASE INFORMATION			Substitute (		
Enf./Case ID No.			No. of Violations	8	
	2007-0493-AIR-E		Order Type		
Media Program(s) Multi-Media	Air		Enf. Coordinato		
Admin. Penalty \$ I	_imit Minimum \$0	Maximum	## EC's Tean	1 <u>[4</u>	
	Ψ		Ψ10,000 <u> </u>		
	. C.	alty Calculat			
TOTAL BASE PENAL	TY (Sum of violation	base penalties	i)	Subtotal 1	\$13,700
ADJUSTMENTS (+/-)	TO SUBTOTAL 1				
	ned by multiplying the Total Base P				
Compliance Histo				totals 2, 3, & 7	\$41,374
	The penalty was enhanced				
Notes	findings order, thirty-nine NOVs for dissimilar violat	novs for similar v	the nenalty was reduced		
		due to six NOAs.	ine penany nas reduced		
Culpability	No	0%	Enhancement	Subtotal 4	\$0
Notes	The Respondent d	loes not meet the	culpability criteria.		
Good Faith Effort	to Comply	00/	_		
Ood raith Lifen		0% RP/Settlement Offer	Reduction	Subtotal 5	\$0
Extraordinary					
Ordinary					
N/A	X (mark with x)			7	
Notes	The Respondent d	oes not meet the	good faith criteria.		
l					
		0% E	nhancement*	Subtotal 6	\$0
Approx (	Total EB Amounts \$853 Cost of Compliance \$12,250	*Capped a	t the Total EB \$ Amount		•
Αρριολ. (	Cost of Compliance \$12,250	_			
SUM OF SUBTOTALS	5 1-7			Final Subtotal	\$55,074
22 s					
	JUSTICE MAY REQU			Adjustment	\$0
Reduces or ennances the Final St	ibtotal by the indicated percentage.	(Enter number only; e	e.g30 for -30%.)	1	
Notes					
•			Final Pe	nalty Amount	\$55,074
STATUTODY LIBRER	DUIGTMENT				
STATUTORY LIMIT A	DOUG HINEN I		Final Asse	ssed Penalty	\$55,074
DEFERRAL			20% Reduction	Adjustment	-\$11,014
	ilty by the indicted percentage. (En	iter number only; e.g. 2	0 for 20% reduction.)	Aujustinem	-φιι,υ14
					***************************************
Notes	Deferral offe	red for expedited	settlement.		***************************************

\$44,060

PAYABLE PENALTY

Screening Date 22-Mar-2007 Docket No. 2007-0493-AIR-E

Respondent Equistar Chemicals, LP Case ID No. 33070

Reg. Ent. Reference No. RN100542281

Media [Statute] Air

Enf. Coordinator Terry Murphy

Policy Revision 2 (September 2002) PCW Revision March 19, 2007

mpliance Histor	Compliance History Worksheet  9 Site Enhancement (Subtotal 2)	Enter Number Here	Adjust.	396.25 388.55
Component	Number of  Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	39	195%	
11003	Other written NOVs	24	48%	
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	2	40%	ŀ
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	mid & Trisnot	25%	
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria).	0 *************	0%	
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	to the Online	0%	
Convictions	Any criminal convictions of this state or the federal government (number of counts)	. 0	0%	
Emissions	Chronic excessive emissions events (number of events)	0	0%	1
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	6	-6%	
Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )		0%	
	Plea	se Enter Yes or No	·	1
	Environmental management systems in place for one year or more	No	0%	
011	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No No	0%	
Other	Participation in a voluntary pollution reduction program	No	0%	_
	Early compliance with, or offer of a product that meets future state or federal governmen environmental requirements	t No	0%	
	Adjustment P	Percentage (S	ubtotal 2)	
epeat Violator (S	ubtotal 3)			
N	o Adjustment I	Percentage (S	ubtotal 3)	<u></u>
ampliance Histo	ry Person Classification (Subtotal 7)	77 4 4	and the second second	
	and the same of th	Percentage (S	ubtotal 7)	Ţ.,
Average		-ercemage (S	ubiolai ij	L
ompliance Histo	ry Summary		1	
Complianc History Notes	The penalty was enhanced due to two previous 1660 style orders, one findings order, thirty similar violations, and twenty-four NOVs for dissimilar violations. Additionally, the penalty w to six NOAs.	rnine NOVs for as reduced due		
	Total Adjustment Percentag			

	Sc	reening Date	22-Mar-2007	Docl	ket No. 2007-0493-AIR-E		PCW
			Equistar Chemicals, LP	**************************************	MANAGEMENT TO CONTINUE	Policy Revisi	on 2 (September 2002)
		Case ID No.					evision March 19, 2007)
Re		eference No.					2007 Waren 19, 2007
		edia [Statute]			4		
		Coordinator					
5.55	Vi	olation Number	1				
	Violati	Rule Cite(s)	("NSRP") 22779, Special 02177, Special Terms a	Il Condition ("SC") 8. and Conditions ("STC Code § 382 ended lines. Specific	22.143(4), New Source Revie E., Federal Operating Permit C") 1. and 10., and Tex. Healt 2.085(b) cally, the Respondent discovery pen-ended line on March 27,	("FOP") O- h & Safety	
			documented durin	g an investigation c	conducted on December 13, 2	2006, as 006.	
					В	ase Penalty	\$10,000
>> Envir	onmenta	al. Property a	nd Human Health Ma	triv			
		,	Harm	UIA			
O.D.		Release	Major Moderate	Minor			
OR		Actual		x			
		Potential			Percent 25%		
>>Progra	ammatic	Matrix					***************************************
r-i rogie	ammanc	Falsification	Major Moderate	Minor			
			Major Moderate	Minor	Percent 0%	7	***************************************
		L		CONTROL CONT	Percent 0%	il .	
	Matrix Notes	Human health	or the environment was e	xposed to insignifica	int amounts of pollutants whic	h would not	
	110163	exceed leve	as protective of numan ne	aith or environmenta	al receptors as a result of the	violation.	
					Adjustment	\$7,500	· ·
							\$2,500
Violation	Events						
				_			***************************************
		Number of Viol	ation Events 1		2 Number of violation da	ays	***************************************
****				1			· · · · · · · · · · · · · · · · · · ·
Giller and a second			daily				***************************************
		mark only one	monthly quarterly x		) ( ) ( ) ( ) ( ) ( ) ( )		
			semiannual		Violation Ba	se Penalty	\$2,500
			annual				
			single event				
		I					
			One quar	terly event is recomi	mended.		***************************************
		<u> </u>					***************************************
Economic	s Benefi	(EB) for this	violation		04-4-74	•	***************************************
		1, .0. 6113			Statutory Limit Te	SI	
		Estimated I	EB Amount	\$3	Violation Final Per	alty Total	\$10,050
							ψ10,000
		-	Ti	nis violation Final A	Assessed Penalty (adjusted	for limits)	\$10,050

	Ε	conomic E	Benefit W	orks	heet	and the second	2
Respondent	Fauistar Chem	icals, LP			$(v_1, v_2) \in \mathcal{C}_{\mathbb{R}^n}$	الإنجائي ترزر	
Case ID No.	33070					and the same	
Reg. Ent. Reference No.	RN100542281						Years of
Media	Air					Percent Interest	Pears of Depreciation
Violation No.							000000000000000000000000000000000000000
Violation (to.						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$				Transfer Vi		
** A 1 2 K2							
Delayed Costs	<del></del>	1	-	0.0	\$0	\$0	\$0
Equipment			*	0,0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	• \$0	n/a	\$0
Land   Record Keeping System				0,0	\$0	n/a	\$0
Record Reeping System Training/Sampling	\$250	12-Jan-2006	27-Mar-2006	0.2	\$3	n/a	\$3
Remediation/Disposal	V400			0,0	\$0	n/a	\$0
Permit Costs				0,0	\$0	n/a	\$0
Other (as needed)				0,0	\$0	n/a	\$0
Notes for DELAYED costs	practices a		equired is based of pliance (date the li	on the ea ast open	ended line was o	apped).	TO THE GALE OF
Avoided Costs	AN	NUALIZE [1] avoid	ed costs before e	entering	Item (except for	Offertiffe avolued	
		The second secon	H			en e	costs)
Disposal				0.0	\$0	\$0.	ΨΟ
Disposal Personnel				0.0	\$0 \$0	\$0.	\$0
Personnel				0.0	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment				0.0 0.0 0.0	\$0 \$0 \$0 \$0	\$0. \$0. \$0	\$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]				0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment				0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0. \$0. \$0	\$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]				0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]				0.0 0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0

Screening Date		Docke	e <b>t No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP		Policy :	Revision 2 (September 2002)
Case ID No. Reg. Ent. Reference No.			P	CW Revision March 19, 2007
Media [Statute]				
Enf. Coordinator				
Violation Number	- I			
Rule Cite(s)	30 řex. Admin. Code §	§ 116.115(c) and 122. and 10., and Tex. Hea	143(4), NSRP 22779, SC 6.A., FOP O- alth & Safety Code § 382,085(b)	
Violation Description	standard cubic foot ("Btu/ Poly Butadiene Unit flare minutes on October 21,	scf"). Specifically, the t fell below 300 Btu/scf t 2005, 1 minute on Mar	eat input of 300 British thermal units per neat content of the combusted gas in the for 6 minutes on November 30, 2005, 22 rch 6, 2006, and 2 minutes on June 11, n conducted on December 13, 2006.	
			Base Penalty	\$10,000
>> Environmental, Property a		ıtrix		
Release	<b>Harm</b> Major Moderate	Minor		
OR Actual	Mederate			***************************************
Potential		X	Percent 10%	
>Programmatic Matrix				
Falsification	Major Moderate	Minor		
			Percent 0%	
Human hoa	of the environment see			1
Matrix Notes which would n	ot exceed levels protective	of human health or er	to insignificant amounts of pollutants overnmental receptors as a result of the	***************************************
		violation.		www
			Adjustment \$9,000	•
			Adjustment \$9,000	***************************************
				\$1,000
/iolation Events				onnonness.
Number of AC		i (===		
Number of Viol	ation Events 1	4	Number of violation days	***************************************
·	daily			
	monthly		-	
mark only one with an x	quarterlysemiannual		Violation Base Penalty	\$1,000
	annual			,
	single event x			
				***************************************
	One single event is	recommended based	on the one flare.	1
conomic Benefit (EB) for this	violation	1 G.	Statutory Limit Test	
Estimated	EB Amount	\$89	Violation Final Penalty Total	\$4,020
		This violation Final A	ssessed Penalty (adjusted for limits)	
		The state of the s	(adjusted for littles)[	\$4,020

	E	conomic E	Benefit W	orks	heet		
Respondent		**************************************	000000000000000000000000000000000000000				: :
Case ID No.	33070					1000	
Reg. Ent. Reference No.	RN100542281						Years of
Media	Air					Percent Interest	Depreciation
Violation No.	2					5.0	15
The Control of the Co						Onetime Costs	EB Amount
44/400	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Alliount
Item Description	No commas or \$						
					7 A TOTAL CONTRACTOR OF THE SECOND		
Delayed Costs				1	<b></b>	so I	\$0
Equipment				0.0	\$0 \$0	\$0	\$0
Buildings		04.0 11.0005	11-Jun-2006	0.6	\$4	\$85	\$89
Other (as needed)	\$2,000	21-Oct-2005	11-Jun-2000	0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	n/a	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling		<del> </del>		0.0	\$0	n/a	\$0
Remediation/Disposal					1		60
				II 0.0	\$0	n/a	\$0
Permit Costs Other (as needed)	Estimated of	set to add suppleme	ental fuel to the fla	0.0 0.0 res to er	\$0	n/a	\$0 a combustible
	gas that has 3	300 Blu/scf or great	er. Date required date is the date	0.0 res to er is based complia	\$0 nsure that the flare on the earliest do nce was achieved	n/a es are operated with ocumentation of the l.	\$0 a combustible deviation, Final
Other (as needed)	gas that has S	300 Blu/scf or great	er. Date required date is the date	0.0 res to er is based complia	\$0  nsure that the flare on the earliest do not was achieved litem (except for	n/a es are operated with ocumentation of the l. one-time avoided	\$0 a combustible deviation, Final costs)
Other (as needed) Notes for DELAYED costs	gas that has S	300 Blu/scf or great	er. Date required date is the date	0.0 res to er is based complia entering	\$0  nsure that the flare on the earliest do nce was achieved item (except for \$0	n/a ss are operated with occumentation of the l. one-time avoided	a combustible deviation, Final costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel	gas that has S	300 Blu/scf or great	er. Date required date is the date	0.0 res to er is based complia entering 0.0 0.0	\$0  nsure that the flare on the earliest donce was achieved item (except for \$0 \$0 \$0	n/a es are operated with commentation of the l, one-time avoided \$0 \$0	a combustible deviation, Final costs)
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel Inspection/Reporting/Sampling	gas that has S	300 Blu/scf or great	er. Date required date is the date	o.o res to er is based complia entering 0.0 0.0 0.0	\$0  nsure that the flare on the earliest dence was achieved item (except for \$0  \$0  \$0	n/a ss are operated with occumentation of the l. one-time avoided	a combustible deviation, Final costs)
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel Inspection/Reporting/Sampling Supplies/equipment	gas that has S	300 Blu/scf or great	er. Date required date is the date	o.o res to er is based complia entering 0.0 0.0 0.0 0.0	sure that the flare on the earliest donce was achieved litem (except for \$0 \$0 \$0 \$0	n/a ss are operated with commentation of the l. one-time avoided \$0 \$0 \$0 \$0 \$0	a combustible deviation, Final costs)  \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	gas that has S	300 Blu/scf or great	er. Date required date is the date	o.o res to er s based complia entering 0.0 0.0 0.0 0.0 0.0	\$0 sure that the flare on the earliest do noe was achieved item (except for \$0 \$0 \$0 \$0 \$0	n/a es are operated with ocumentation of the i. one-time avoided \$0 \$0 \$0	a combustible deviation, Final Costs)  \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	gas that has S	300 Blu/scf or great	er. Date required date is the date	o.o res to er is based complia entering 0.0 0.0 0.0 0.0	sure that the flare on the earliest donce was achieved litem (except for \$0 \$0 \$0 \$0	n/a ss are operated with soumentation of the l. sone-time avoided \$0 \$0 \$0 \$0 \$0 \$0	a combustible deviation, Final costs)  \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	gas that has S	300 Blu/scf or great	er. Date required date is the date	0.0 res to er is based complia entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	sure that the flare on the earliest dence was achieved item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ss are operated with soumentation of the l, one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	a combustible deviation, Final costs)  \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	gas that has 3	300 Blu/scf or great	er. Date required date is the date	0.0 res to er is based complia entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	sure that the flare on the earliest dence was achieved item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ss are operated with soumentation of the l, one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	a combustible deviation, Final costs)  \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	gas that has 3	300 Blu/scf or great	er. Date required date is the date ed costs before e	0.0 res to er is based complia entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	sure that the flare on the earliest dence was achieved item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ss are operated with commentation of the l. sone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	a combustible deviation, Final costs)  \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		Docket	<b>t No.</b> 2007-0493-AIR-E		PCW
<ul> <li>Marchard Constitution (1998) See Marchard Constitution (1998)</li> </ul>	Equistar Chemicals, LP			Policy Revis	ion 2 (September 2002)
Case ID No. Reg. Ent. Reference No.				PCW F	Revision March 19, 2007
Media [Statute]					
Enf. Coordinator					
Violation Number					
Rule Cite(s)		115.726(d)(3) and 122. ex. Health & Safety Cod	143(4), FOP O-02177, STC 1 de § 382.085(b)	.J.(ii), and	
Violation Description	Respondent failed to con corrective action reports	nplete Highly Reactive \ for the Poly Butadiene l	equired time frame. Specifica /olatile Organic Compound (" Unit flare within the required the as documented during an inver 13, 2006.	HRVOC") me frame	
The state of the s			Bas	e Penalty	\$10,000
>> Environmental, Property a	ind Human Health Ma	atrix			
	Harm				
OR Release	Major Moderate	Minor			
Potential			Percent 0%		***************************************
>>Programmatic Matrix					***************************************
Falsification	Major Moderate	Minor,			***************************************
		X	Percent 1%		***************************************
The state of the s				***************************************	000000000000000000000000000000000000000
Matrix Notes	Less than 30%	6 of the rule requirement	t was not met.		
		3,52	Adjustment	\$9,900	***************************************
					\$100
Violation Events					
Number of Vio	lation Events 6	6	Number of violation da	ys	observed the second sec
mark only one	daily monthly quarterly		Violation Bas	e Penalty	\$600
with an x	semiannual annual single event x				· ·
	Six single events are	recommended based o	n the violation days.		
Economic Benefit (EB) for thi	s violation	•	Statutory Limit Te	st	
Estimated	I EB Amount	\$23	Violation Final Pen	alty Total	\$2,412
*		This violation Final A	ssessed Penalty (adjusted t	for limits)	\$2,412
		The contract of the contract of	(aajastou		<i>+=,</i>

		conomic E	senetit W	orks	sneet		
Respondent		cals, LP			1,		
Case ID No.							200
Reg. Ent. Reference No.							Years of
Media						Percent Interest	Depreciation
Violation No.	3					5.0	•
			Flori Dess	Yrs	Interest Saved	L	
ACCESS OF THE PARTY OF THE PART	Item Cost	Date Required	Final Date	115	Illerest Saved	Offerine dusts	LD Allicult
Item Description	No commas or \$				Maria Cara Cara		
6.1							
Delayed Costs Equipment		ı ı		0.0	\$0	\$0	\$0
Buildings	200			0,0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	\$0	\$0
Engineering/construction	5857 St. 757			0,0	\$0	\$0	\$0
Land	25 (25)		A	0,0	\$0	n/a	\$0
Record Keeping System	\$1,000	29-Mar-2006	13-Sep-2006	0.5	\$23	n/a	\$23
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0,0	\$0	n/a	\$0
Permit Costs	250270339300000000000000000000000000000000						
				0.0	\$0	n/a	\$0 *0
Other (as needed)	Estimated co	est for additional ov	ersight and manag	0.0 gement i	\$0 practices designe	n/a d to ensure proper r	\$0 ecord keeping
	Estimated co	est for additional ov lowed. Date require	ed is based on the	0.0 gement j earliest	\$0 practices designe	n/a	\$0 ecord keeping
Other (as needed)  Notes for DELAYED costs	pratices are fol	lowed. Date require	ed is based on the complia	0.0 gement i earliest nce was	\$0 practices designe t documentation o achieved.	n/a d to ensure proper r f the violation. Fina	\$0 ecord keeping I date is the da
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS	pratices are fol	lowed. Date require	ed is based on the complia	0.0 gement i earliest nce was	\$0 practices designe t documentation o achieved.	n/a d to ensure proper r f the violation. Fina one-time avoided	\$0 record keeping I date is the da
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal	pratices are fol	lowed. Date require	ed is based on the complia	0.0 gement   earliest nce was ntering	\$0 practices designe t documentation of achieved.  item (except for \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided	\$0 record keeping I date is the date costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel	pratices are fol	lowed. Date require	ed is based on the complia	gement   earliest nce was ntering   0.0   0.0   0.0   0.0	\$0 practices designet documentation of achieved.  Item (except for \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided (1,\$0) \$0	\$0 ecord keeping I date is the
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal	pratices are fol	lowed. Date require	ed is based on the complia	gement   earliest nce was ntering   0.0	\$0 practices designet documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided   (1,\$0)/)   \$0   \$0   \$0	so ecord keeping I date is the date costs) SO SO SO SO
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel  Inspection/Reporting/Sampling	pratices are fol	lowed. Date require	ed is based on the complia	0.0 gement   earliest nce was ntering 0.0 0.0 0.0 0.0 0.0	\$0 practices designet documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided \$0 \$0 \$0 \$0 \$0	so ecord keeping I date is the da  costs) so so so so so
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel Inspection/Reporting/Sampling Supplies/equipment	pratices are fol	lowed. Date require	ed is based on the complia	0.0     0.0	\$0 practices designer documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided in \$0./2 \$0 \$0 \$0 \$0	\$0 ecord keeping I date is the
Other (as needed)  Notes for DELAYED costs  AVOICE COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	pratices are fol	lowed. Date require	ed is based on the complia	0.0 gement   earliest nce was ntering 0.0 0.0 0.0 0.0 0.0	\$0 practices designet documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided \$0 \$0 \$0 \$0 \$0	\$0 record keeping I date is the date is th
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	pratices are fol	lowed. Date require	ed is based on the complia	0.0     0.0	\$0 practices designer documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided in \$0./2 \$0 \$0 \$0 \$0	\$0 ecord keeping I date is the
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	pratices are fol	lowed. Date require	ed is based on the complia	0.0     0.0	\$0 practices designer documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided in \$0./2 \$0 \$0 \$0 \$0	\$0 ecord keeping I date is the
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	pratices are fol	lowed. Date require	ed is based on the complia	0.0     0.0	\$0 practices designer documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided in \$0./2 \$0 \$0 \$0 \$0	\$0 ecord keeping I date is the
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	pratices are fol	lowed. Date require	ed is based on the complia	0.0     0.0	\$0 practices designer documentation of achieved.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a d to ensure proper r f the violation. Fina one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 ecord keeping I date is the

Screening Dat		Docke	<b>t No.</b> 2007-0493-AIR-E	PCW
	<b>t</b> Equistar Chemicals, LP		Policy R	Revision 2 (September 2002)
Case ID No				W Revision March 19, 2007
Reg. Ent. Reference No				
Media [Statute				
Enf. Coordinato				
Violation Numbe	Lancard Control of Con			_
Rule Cite(s	Failed to calibrate the P	ex. Health & Safety Codes oly Butadiene Unit flare	143(4), FOP O-02177, STC 1.J.(ii), and de § 382.085(b) analyzer. Specifically, the Respondent int calibration of the flare analyzer for	
Violation Description	HRVOCs from Januar	y 1 to June 28, 2006, as conducted on Decemb	documented during an investigation	\$10,000
			7	
>> Environmental, Property		atrix		
Release	Harm • Major Moderate	Minor		
OR Actua		T Carrier		
Potentia	I The state of the	x	Percent 10%	***************************************
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		
			Percent 0%	
Matrix Notes Human he which would	ealth or the environment countries of the countries of th	uld have been exposed e of human health or en violation.	to insignificant amounts of pollutants vironmental receptors as a result of the  Adjustment \$9,000	Transmission and the second se
			·	\$1,000
			L	\$1,000
Violation Events				
Number of Vi	olation Events 2	178	Number of violation days	
mark only one with an x	daily monthly quarterly semiannual annual single event  x		Violation Base Penalty	\$2,000
	Two sin	gle events are recomme	ended.	
Economic Benefit (EB) for th	is violation	314 6386	Statutory Limit Test	
Estimated	d EB Amount	\$49	Violation Final Penalty Total	\$8,040
		This visited:	- <b>L</b>	
		inis violation Final As	ssessed Penalty (adjusted for limits)	\$8,040

	E	conomic E	Benefit W	'orks	heet	Barrier Barrier	
Respondent B	San Aller and Aller a	Constitution and the constitution of the const	0.42.2.200.4.4.000.000.0000.0000.0000.0			* 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
Case ID No. 3		•				1 8 4 v.	£
Reg. Ent. Reference No. F							*
Media /	Air					Percent Interest	Years of
Violation No. 4						1 0100/16 11169/3007	Depreciation
VIOIALIOITI40.	•					5.0	15
Paul Marie Land	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
		Date Required	I mai Date				
Item Description	No commas or \$						***************************************
Delayed Costs		11		0.0	\$0	\$0	\$0
Equipment Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	\$0	\$0
Engineering/construction		1800 (615 147)		0.0	\$0	\$0	\$0
Land				0,0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$2,000	1-Jan-2006	28-Jun-2006	0.5	\$49	n/a	\$49
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0 \$0
Other (as needed)				0,0	\$0	n/a	- QU
Notes for DELAYED costs	practices a	are followed. Date F cc	Required is the ea empliance (date m	arliest dat nulti-point	te of non-compilar t calibration occur	4	strie date of
Avoided Costs	ANN	IUALIZE [1] avoide	ed costs before	entering	Item (except for	one-time avoided	costs)
Disposal	(2)			_   0.0	\$0	\$0	\$0 \$0
Personnel				0.0	\$0	\$0	\$0 \$0
Inspection/Reporting/Sampling				0.0	\$0 \$0	\$0 \$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)		<u> </u>	L		. ΨΟ	1 49	
Notes for AVOIDED costs						Signification (Signification)	
Approx. Cost of Compliance		\$2,000			TOTAL		\$49

Screening Date		Docke	<b>t No.</b> 2007-0493-AIR-E	PCW
Respondent Case ID No.	Equistar Chemicals, LP		Policy F	Revision 2 (September 2002)
Reg. Ent. Reference No.			PC	W Revision March 19, 2007
Media [Statute]				***************************************
Enf. Coordinator				***************************************
Violation Number				***************************************
Rule Cite(s)	30 Tex. Admin. Code § 12	2.121 and Tex. Hea 382.054	lth & Safety Code §§ 382.085(b) and	***************************************
Violation Description	to operation. Specifically, Embut was misrepresented in Fe	nission Point No. ("E deral Operating Per	ces and their associated emissions prior PN") MPBDM3219 had been operating rmit O-02177 in an incorrect location, as ducted on December 13, 2006.	
			Base Penalty	\$10,000
>> Environmental, Property a  Release OR Actual Potential	nd Human Health Matri: Harm Major Moderate	Minor	Percent 0%	
>>Programmatic Matrix		_		***************************************
Falsification	Major Moderate	Minor		***************************************
		X	Percent 1%	000000000
				and the second
Matrix Notes	Less than 30% of t	he rule requirement	was not met.	
			Adjustment \$9,900	
	•			\$100
Violation Events				
••				
Number of Viola	ation Events 1	945	Number of violation days	***************************************
	daily monthly quarterly semiannual annual single event x		Violation Base Penalty	\$100
				annahven
	One single	event is recommen	ded,	
Economic Benefit (EB) for this	violation	e in general	Statutory Limit Test	
Estimated E	B Amount	\$231	Violation Final Penalty Total	\$402
	This	violation Final As	sessed Penalty (adjusted for limits)	\$402
		The state of the s	vindity (deljusted for milits)	φ <del>4</del> 02

	E	conomic E	Benefit W	orksn	eet		
Respondent			800000000000000000000000000000000000000		State of the		W. T.
Case ID No.	33070	•				$\mathcal{A}_{i,j} = \mathcal{A}_{i,j} + \mathcal{A}_{i,j}$	1.6
Reg. Ent. Reference No.	RN100542281					.,	
Media	Air					Percent Interest	Years of
Violation No.							Depreciation
Violation is a	•					5.0	15
	Item Cost	Date Required	Final Date	Yrs In	terest Saved	Onetime Costs	EB Amount
		Date Require					
Item Description	No commas or \$						
_		1 100					
Delayed Costs		ır I		1. o.o T	\$0	\$O	\$0
Equipment Buildings				0.0	\$0	\$0	\$0
Other (as needed)		-		0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Engineering/construction Land				0,0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Record Reeping System Training/Sampling				0.0	\$0	n/a	\$0 \$0
			THE STREET STREET, SHOWING STREET, SANSAN, SAN	A A			560
n-madiation/Dienceal	TOTAL MARKET SERVICES	11		0.0	\$0	n/a	
Remediation/Disposal	\$1.500	19-Aug-2004	16-Sep-2007	3.1	\$231	n/a	\$231
Remediation/Disposal Permit Costs Other (as needed)	\$1,500	19-Aug-2004		3.1 0.0	\$231 \$0	n/a n/a	\$231 \$0
Permit Costs	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the	n/a n/a sions source should a date of compliance	\$231 \$0 *1 ,1:::::::::::::::::::::::::::::::::::
Permit Costs Other (as needed)	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0,0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the	n/e n/a sions source should e date of complianc one-time avoided	\$231 \$0 \$1,1036096615 I have been e.
Permit Costs Other (as needed) Notes for DELAYED costs	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the in (except for \$0	n/a n/a history sions source should e date of compliand one-time avoided	\$231 \$0 \$1, (c) (constitution) (have been e. costs)
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the m (except for \$0 \$0	n/a n/a n/a n/a sions source should a date of complianc one-time avoided \$0' \$0	\$231 \$0 **I fraction(ff) have been e. costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs Avoided Cost: Disposal	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 julred is the as issued, F	\$231 \$0 date the emis inal Date is the im (except for \$0 \$0	n/a n/a sions source shoulded e date of compliance one-time avoided \$0' \$0 \$0 \$0	\$231 \$0 \$1,122,1246615 have been e. costs) \$0 \$0
Permit Costs Other (as needed) Notes for DELAYED costs AVOIDE COST Disposal Personnel	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the in (except for \$0 \$0 \$0 \$0	n/a n/a n/a  11(1/2) slons source shoulde e date of compliand one-time avoided \$0'' \$0 \$0 \$0	\$231 \$0 \$1,\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOICE COST  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 uired Is the as issued, F entering Ite 0.0 0.0 0.0 0.0 0.0	\$231 \$0 date the emis inal Date is the m (except for \$0 \$0 \$0 \$0	n/a	\$231 \$0 \$1,\text{\tin}\text{\te}\tint{\text{\text{\text{\text{\text{\text{\text{\ti}\tint{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\texi}\text{\text{\text{\text{\texi}\text{\texi\texi{\texi{\texi{\texi\tex{\text{\text{\texi{\text{\texi}\tint{\text{\texi}\text{\t
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOICE COST Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the m (except for \$0 \$0 \$0 \$0	n/a n/a n/a  11(1/2) slons source shoulde e date of compliand one-time avoided \$0'' \$0 \$0 \$0	\$231 \$0 \$1   bit contint have been e. costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost: Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 uired Is the as issued, F entering Ite 0.0 0.0 0.0 0.0 0.0	\$231 \$0 date the emis inal Date is the m (except for \$0 \$0 \$0 \$0	n/a n/a n/a sions source should determine avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$231 \$0 \$1, fractive(ff); have been e.
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost: Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimate	d cost to revise the authorized when the	permit. Date Rec ne initial permit wa	3.1 0.0 juired is the as issued, F	\$231 \$0 date the emis inal Date is the m (except for \$0 \$0 \$0 \$0	n/a n/a n/a sions source should determine avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$231 \$0 \$1, fractive(ff); have been e.

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Screening Date	22-Mar-2007 Equistar Chemicals, LP	Dock	et No. 2007-0493-AIR-E	PCW
Case ID No.				Policy Revision 2 (September 200
Reg. Ent. Reference No.				PCW Revision March 19, 20
Media [Statute]	Air			
Enf. Coordinator	Terry Murphy			
Violation Number	6			
Rule Cite(s)	30 Tex Admin Code 88	116 116/6\/0\/5\ 1		
	02177, STC	C 10, and Tex. Health	122.143(4), NSRP 49120, SC 1, & Safety Code § 382.085(b)	FOP O-
Violation Description	compounds ("VOCs"). Ti	l Separator (EPN 32E he authorized emissio	nits. Specifically, emissions for the 06) were 4.6 tons of volatile organ ns limit for emissions under the p vestigation conducted on Decem	nic
			Base	Penalty \$10,00
> Environmental, Property a	nd Human Health Ma	itrix		
Release	Harm Major Moderate	Minor		
OR Actual	Major Moderate	Minor X		
Potential			Percent 25%	
>Programmatic Matrix				
Falsification	Major Moderate	Minor		
	Midderate	Minor	Percent 0%	
<u> </u>			076	
Matrix Human health	or the environment was a	yposed to incignified		
Notes exceed leve	els protective of human he	ealth or environmental	t amounts of pollutants which wo receptors as a result of the violat	uld not
			Adjustment	\$7,500
				\$2,500
iolation Events				
Number of Vist		7		
Number of Viola	ation Events 1	36	Number of violation days	
	daily			
	monthly			
mark only one with an x	quarterly		Violation Base P	Penalty \$2,500
	semiannual x			
5	ingle event			
	One and	nual event is recomme	ended.	
conomic Benefit (EB) for this	violation		Statutory Limit Test	
Estimated E	B Amount	\$427	Violation Final Penalty	/ Total \$10,050
	`	This violation Final A	ssessed Penalty (adjusted for I	
		- Transfer i mai A	seesed i enaity (aujusted for t	limits) \$10,050

	E	conomic B	lenefit W	orksl	neet		
Respondent	Equistar Chemi	cals, LP			1 40 g = 5		# 11
Case ID No.	33070					and the second	r :
Reg. Ent. Reference No.	RN100542281				1 1		Years of
Media	Air					Percent Interest	Depreciation
Violation No.	6					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
(ten) bescription	140 CONTINUES OF W						gross 1944-142 - 11. 11. 11.
Delayed Costs							- 60
Delayeu Gosta Equipment				0,0	\$0	\$0	\$0 \$0
Buildings				0,0	\$0	\$0 \$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction		72.5		0,0	\$0	n/a	U notisoniV
Land				0.0	\$0 80	n/a	\$0
Record Keeping System				0.0	\$0 \$0	n/a	\$0
Training/Sampling				0.0	\$0 \$0	n/a	\$0
Remediation/Disposal			2000	0.0		n/a	\$171
Permit Costs	\$1,000	1-Jan-2005	1-Jun-2008	3.4	\$171 \$256		\$256
Permit Costs Other (as needed)	\$1,500	1-Jan-2005	1-Jun-2008	3,4	\$256	n/a	\$256
	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3,4 ional over Required f prospect	\$256 sight and manag is the earliest da ive compliance.	n/a ement practices des te of non-complianc	\$256 signed to ensure e and Final Date
Other (as needed)  Notes for DELAYED costs	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3,4 lonal over Required f prospect entering	\$256 sight and manag- is the earliest da- ive compliance. Item (except for	n/a ement practices des te of non-complianc one-time avoided	\$256 signed to ensure e and Final Date costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs	\$1,500 Estimated corproper mainte	1-Jan-2005	1-Jun-2008 permit and additi followed: Date is the date of	3,4 ional over Required f prospect entering 0,0	\$256 sight and manag is the earliest da ive compliance.  Item (except for	n/a ement practices deste of non-compliance one-time avoided	\$256 signed to ensure e and Final Date costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0	\$256 sight and manag is the earliest da ive compliance.  item (except for \$0 \$0	n/a ement practices detected from compliance one-time avoided     \$0	\$256 signed to ensure e and Final Date costs) \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0	\$256 sight and manag is the earliest da ive compliance. item (except for \$0 \$0	n/a ement practices deste of non-compliance one-time avoided \$0\$0\$0\$0\$0\$0\$0\$0.	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel  Inspection/Reporting/Sampling	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0	\$256 sight and managis the earliest daive compliance.  Item (except för \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ement practices det te of non-compliance one-time avoided \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs)  \$0  \$0  \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0	\$256  sight and manage is the earliest da ive compliance.  item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ement practices detected from the compliance of non-compliance one-time avoided \$0.000 \$0.000 \$0.000 \$0.000 \$0.000 \$0.000 \$0.0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel  Inspection/Reporting/Sampling  Supplies/equipment  Financial Assurance [2]	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$256 sight and manage is the earliest dative compliance.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ement practices dete of non-compliance one-time avoided   \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0	\$256  sight and manage is the earliest da ive compliance.  item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ement practices detected from the compliance of non-compliance one-time avoided \$0.000 \$0.000 \$0.000 \$0.000 \$0.000 \$0.000 \$0.0	\$256 signed to ensure e and Final Date  costs)  \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$256 sight and manage is the earliest dative compliance.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ement practices dete of non-compliance one-time avoided   \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$256 sight and manage is the earliest dative compliance.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ement practices dete of non-compliance one-time avoided   \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$256 sight and manage is the earliest dative compliance.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ement practices dete of non-compliance one-time avoided   \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008 permit and additi followed: Date is the date of	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$256 sight and manage is the earliest dative compliance.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a ement practices dete of non-compliance one-time avoided   \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$1,500 Estimated corproper mainte	1-Jan-2005   st for amending the nance practices are	1-Jun-2008  permit and additification followed. Date is the date of side costs before	3.4 ional over Required f prospect entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$256 sight and manage is the earliest dative compliance.  Item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ement practices det te of non-compliance one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$256 signed to ensure e and Final Date  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date Respondent	22-Mar-2007 Equistar Chemicals, LP	Docke	et No. 2007-0493-AIR-E	PCW
Case ID No.	33070			Policy Revision 2 (September 2002) PCW Revision March 19, 2007
Reg. Ent. Reference No. Media [Statute]				,
Enf. Coordinator	Terry Murphy			
Violation Number	7			
Rule Cite(s)	30 Tex. Admin. Code §	§ 115.136(a)(1) and 122 ex. Health & Safety Co	2.143(4), FOP O-02177, STC 1.A., de § 382.085(b)	and
Violation Description	Failed to maintain suffic water separator exemptio	cient records to demons on criteria, as document December 13,	trate continuous compliance with \ ed during an investigation conduct 2006.	/OC ed on
			Base Pe	nalty \$10,000
>> Environmental, Property a	nd Human Health Ma Harm	atrix		þ.
OR Release	Major Moderate	Minor		
Potential			Percent 0%	
>>Programmatic Matrix			<b></b>	
Falsification	Major Moderate	Minor		***************************************
	X		Percent 25%	
Matrix Notes	100% of th	ne rule requirement was	not met.	
			Adjustment \$7	<u>',500</u>
				\$2,500
Violation Events				
		68	Number of violation days	
	daily			
	monthly			i
mark only one with an x	quarterlysemiannual		Violation Base Per	salty \$2,500
	annual	. 4		
	single event x			***************************************
	One sir	ngle event is recommen	dod	
		igio eventis recommen	ueu.	
Economic Benefit (EB) for this	violation		Statutory Limit Test	
Estimated E	B Amount	\$9	Violation Final Penalty T	otal \$10,050
	-	This violation Final As	sessed Penalty (adjusted for lim	
				,,

	E	conomic E	3enefit W	orks	heet	1,000	
Respondent I		600000000000000000000000000000000000000		1	produktion is	and the second	
Case ID No. :	33070				1	di in	
Reg, Ent. Reference No. I	RN100542281						Years of
Media	Air					Percent Interest	Depreciation
Violation No.	7			*******************			000000
					201000	5.0	, 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description						applift of the	<b>1</b>
Item Description	Mo continues or w	The Control of the Co				4	
Delayed Costs							
Delayed Costs Equipment				0,0	\$0	\$0	\$0
Buildings				0,0	\$0	\$0	\$0 \$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0,0	\$0	n/a	\$0
Land				0.0	\$0	n/a	\$9
Record Keeping System	\$1,000	20-Aug-2005	27-Oct-2005	0,2	\$9 \$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal	Part of the second			0.0	\$0	n/a	\$0
Permit Costs				0.0	\$60	n/a	\$0
Notes for DELAYED costs	Estimated co	are followed Date	Required is the ea	igement irliest da	practices designe te of non-complia	d to ensure proper ince and Final Date i	ic the date of
		compliance (d	ate sampling occi	urred and	a record keeping v	vas communeccy.	io uto udio si
Avoided Costs	ANN	compliance (d	ate sampling occi	entering	ltem (except for	one-time avoided	costs)
Avoided Costs	ANN	compliance (d	ate sampling occi	entering	item (except for	one-time avoided	costs)
Avoided Costs Disposal Personnel	ANN	compliance (d	ate sampling occi	entering	item (except for	one-time avoided	costs) \$0 \$0
Disposal Personnel	ANN	compliance (d	ate sampling occi	entering 0.0 0.0 0.0	item (except for \$0 \$0 \$0	one-time avoided \$0	costs) 4.: \$0 \$0 \$0 \$0
Disposal	ANN	compliance (d	ate sampling occi	entering	j item (except for \$0 \$0 \$0 \$0	one-time avoided \$0	costs) \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	ANN	compliance (d	ate sampling occi	entering 0.0 0.0 0.0 0.0 0.0		one-time avoided   \$0	Costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANN \$111.12	compliance (d	ate sampling occi	entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	SO	one-time avoided \$0	costs) \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANN	compliance (d	ate sampling occi	entering 0.0 0.0 0.0 0.0 0.0		one-time avoided	Costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANN \$111.12	compliance (d	ate sampling occi	entering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	SO	one-time avoided	Costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

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Screening Date		Docke	<b>t No.</b> 2007-0493-AIR-E	PCW
Case ID No.	Equistar Chemicals, LP			Policy Revision 2 (September 2002)
Reg. Ent. Reference No.				PCW Revision March 19, 2007
Media [Statute]				
Enf. Coordinator				
Violation Number	8			
Rule Cite(s)	30 Tex. Admin. Code § 02177, STC 1.A.	§ 116.115(c) and 122.1 and 10., and Tex. Heal	43(4), NSRP 22779, SC 8.I., Fo th & Safety Code § 382.085(b)	OP 0-
Violation Description	from December 22, 2	e scheduled repairs of a	eduled shutdown. Specifically, a valve during the scheduled sl 1, 2006, as documented during ecember 13, 2006.	autdown
			Base	Penalty \$10,000
>> Environmental, Property a	nd Human Health <mark>M</mark> a	trix		
Release	<b>Harm</b> Major Moderate	Minor		
OR Actual	Widger Wilderate	Minor		***************************************
Potential			Percent 25%	
>>Programmatic Matrix				,
Falsification	Major Moderate	Minor		***************************************
	- Moderate	WIIIO	Percent 0%	***************************************
			070	
Matrix Notes Human health exceed leve	or the environment was e	xposed to insignificant a alth or environmental re	amounts of pollutants which wo sceptors as a result of the viola Adjustment	uld not lion,
			-	
B=1-8: F				\$2,500
Violation Events				
	1	41	Number of violation days	
·		L	ramoor of violation days	
	daily			***************************************
	monthly quarterly x semiannual annual ingle event		Violation Base F	Penalty \$2,500
	One quarterly event is n	ecommended based on	the violation dates.	
conomic Benefit (EB) for this	violation		Statutory Limit Test	
Estimated E	B Amount	\$23	Violation Final Penalty	Total \$10,050
	-		•	
	I	ins violation Final Ass	sessed Penalty (adjusted for l	imits) \$10,050

	Е	conomic E	lenefit W	orks	heet		
Respondent	Contract to the contract of th	(2.50)(2.50000-2.501041.241-1000-1000-1000-1000-1000-1000-1000-1	60000000000000000000000000000000000000			1.0	
Case ID No.							
Reg. Ent. Reference No.					1		Years of
Media	Air					Percent Interest.	Depreciation
Violation No.							
Violation No.	Ü					5,0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
nem pesciption	140 00118100	The second section of the second section of		10	4.4		
Delayed Costs			12 B 1 2265	<u> </u>	\$1	\$22	\$23
Equipment	\$2,000	22-Dec-2005	19-Feb-2006	0,2	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0,,,
Engineering/construction				0.0	\$0	n/a	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal		4		0.0	\$0	n/a	\$0
Permit Costs Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs	made. I	cost for additional ov Date Required is the	earliest date of r	ion-comp	ijanice and i mart	pate is the date of	
Avoided Costs	AN	NUALIZE [1] avoide	ed costs before	entering	Item (except for	one-time avoided  \$0	Costs)
Disposal				0,0	\$0 \$0	\$0	\$0
Personnel				0.0	\$0 \$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	\$0
Other (as needed)			L	0.0	1 Φ0	1ΥΥ	
Notes for AVOIDED costs							
							177
Approx. Cost of Compliance		\$2,000	]	-	TOTA		\$23

#### **Compliance History**

Customer/Respondent/Owner-Operator: CN600124705 Equistar Chemicals, LP Classification: AVERAGE Rating: 2.55 Regulated Entity: RN100542281 CHANNELVIEW COMPLEX Classification: AVERAGE Site Rating: 2.25 ID Number(s): AIR OPERATING PERMITS ACCOUNT NUMBER HG0033B AIR OPERATING PERMITS PERMIT 1426 AIR OPERATING PERMITS PERMIT 2174 AIR OPERATING PERMITS PERMIT 2175 AIR OPERATING PERMITS **PERMIT** 2176 AIR OPERATING PERMITS PERMIT 2177 AIR OPERATING PERMITS PERMIT 2178 AIR OPERATING PERMITS PERMIT 2179 AIR OPERATING PERMITS PERMIT 2180 AIR OPERATING PERMITS PERMIT 2181 AIR OPERATING PERMITS **PERMIT** 2182 AIR OPERATING PERMITS PERMIT 2183 AIR OPERATING PERMITS PERMIT 2184 AIR OPERATING PERMITS PERMIT 2185 WASTEWATER PERMIT WQ0000391000 WASTEWATER PERMIT TPDES0003531 WASTEWATER PERMIT TX0003531 AIR NEW SOURCE PERMITS **PERMIT** 1768 AIR NEW SOURCE PERMITS PERMIT 2128 AIR NEW SOURCE PERMITS PERMIT 2933 AIR NEW SOURCE PERMITS PERMIT 2935 AIR NEW SOURCE PERMITS PERMIT 2936 AIR NEW SOURCE PERMITS PERMIT 3130A AIR NEW SOURCE PERMITS PERMIT 3294 AIR NEW SOURCE PERMITS PERMIT 3627 AIR NEW SOURCE PERMITS PERMIT 6245 AIR NEW SOURCE PERMITS PERMIT 6387 AIR NEW SOURCE PERMITS PERMIT 8123 AIR NEW SOURCE PERMITS PERMIT 8125 AIR NEW SOURCE PERMITS PERMIT 10586 AIR NEW SOURCE PERMITS PERMIT 10700 AIR NEW SOURCE PERMITS **PERMIT** 10812 AIR NEW SOURCE PERMITS PERMIT 11735 AIR NEW SOURCE PERMITS PERMIT 12334 AIR NEW SOURCE PERMITS PERMIT 13849 AIR NEW SOURCE PERMITS PERMIT 15348 AIR NEW SOURCE PERMITS PERMIT 12341 AIR NEW SOURCE PERMITS PERMIT 22779 AIR NEW SOURCE PERMITS PERMIT 23079 AIR NEW SOURCE PERMITS PERMIT 24677 AIR NEW SOURCE PERMITS PERMIT 24887 AIR NEW SOURCE PERMITS **PERMIT** 30868 AIR NEW SOURCE PERMITS PERMIT 32324 AIR NEW SOURCE PERMITS PERMIT 32136 AIR NEW SOURCE PERMITS PERMIT 32629 AIR NEW SOURCE PERMITS **PERMIT** 33899 AIR NEW SOURCE PERMITS PERMIT 34036 AIR NEW SOURCE PERMITS PERMIT 34897 AIR NEW SOURCE PERMITS PERMIT 38750 AIR NEW SOURCE PERMITS PERMIT 42948 AIR NEW SOURCE PERMITS **PERMIT** 43770 AIR NEW SOURCE PERMITS PERMIT 45332 AIR NEW SOURCE PERMITS **PERMIT** 46417 AIR NEW SOURCE PERMITS PERMIT 47326 AIR NEW SOURCE PERMITS PERMIT 47487 AIR NEW SOURCE PERMITS PERMIT 50141 AIR NEW SOURCE PERMITS PERMIT 50142 AIR NEW SOURCE PERMITS **PERMIT** 50165 AIR NEW SOURCE PERMITS PERMIT 50322 AIR NEW SOURCE PERMITS ACCOUNT NUMBER HG0033B AIR NEW SOURCE PERMITS **PERMIT** 50812 AIR NEW SOURCE PERMITS PERMIT 52720 AIR NEW SOURCE PERMITS PERMIT 52726 AIR NEW SOURCE PERMITS PERMIT 54098 AIR NEW SOURCE PERMITS REGISTRATION 54602 AIR NEW SOURCE PERMITS PERMIT 54801 AIR NEW SOURCE PERMITS **PERMIT** 55104 AIR NEW SOURCE PERMITS PERMIT 55669

AIR NEW SOURCE PERMITS

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PERMIT

REGISTRATION

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PSDTX991

56137

AIR NEW SOURCE PERMITS	REGISTRATION	70323
AIR NEW SOURCE PERMITS	PERMIT	49120
AIR NEW SOURCE PERMITS	PERMIT	49130
AIR NEW SOURCE PERMITS	REGISTRATION	76017 75881
AIR NEW SOURCE PERMITS	REGISTRATION REGISTRATION	76313
AIR NEW SOURCE PERMITS	REGISTRATION	76277
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AIR NEW SOURCE PERMITS	PERMIT	55680
AIR NEW SOURCE PERMITS	REGISTRATION	72713
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AIR NEW SOURCE PERMITS	REGISTRATION	74416
AIR NEW SOURCE PERMITS	REGISTRATION	74563
AIR NEW SOURCE PERMITS	REGISTRATION	74944
AIR NEW SOURCE PERMITS	REGISTRATION	74949
AIR NEW SOURCE PERMITS	REGISTRATION	75322 PSDTX993
AIR NEW SOURCE PERMITS	EPA ID REGISTRATION	76651
AIR NEW SOURCE PERMITS	REGISTRATION	76666
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AIR NEW SOURCE PERMITS	REGISTRATION	78252
AIR NEW SOURCE PERMITS	REGISTRATION	78278
AIR NEW SOURCE PERMITS	REGISTRATION	78343 78381
AIR NEW SOURCE PERMITS	REGISTRATION REGISTRATION	78560
AIR NEW SOURCE PERMITS AIR NEW SOURCE PERMITS	REGISTRATION	78772
AIR NEW SOURCE PERMITS	REGISTRATION	78819
AIR NEW SOURCE PERMITS	REGISTRATION	78978
AIR NEW SOURCE PERMITS	REGISTRATION	78599
AIR NEW SOURCE PERMITS	PERMIT	72756
AIR NEW SOURCE PERMITS	REGISTRATION	79261
AIR NEW SOURCE PERMITS	REGISTRATION	79431
AIR NEW SOURCE PERMITS	REGISTRATION	.79460
AIR NEW SOURCE PERMITS	REGISTRATION	79647
AIR NEW SOURCE PERMITS	REGISTRATION	79712
AIR NEW SOURCE PERMITS	REGISTRATION	79892
AIR NEW SOURCE PERMITS	REGISTRATION	79938
AIR NEW SOURCE PERMITS	REGISTRATION	80296
AIR NEW SOURCE PERMITS	REGISTRATION	80137 80449
AIR NEW SOURCE PERMITS	REGISTRATION REGISTRATION	80597
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AIR NEW SOURCE PERMITS AIR NEW SOURCE PERMITS	REGISTRATION	80914
AIR NEW SOURCE PERMITS	REGISTRATION	81190
AIR NEW SOURCE PERMITS	REGISTRATION	81189
AIR NEW SOURCE PERMITS	REGISTRATION	81543
AIR NEW SOURCE PERMITS	REGISTRATION	81636
AIR NEW SOURCE PERMITS	REGISTRATION	81630 81716
AIR NEW SOURCE PERMITS	REGISTRATION	81716 TXD058275769
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	172000210108
GENERATION INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	30030
GENERATION		

INDUSTRIAL AND HAZARDOUS WASTE

STORAGE

INDUSTRIAL AND HAZARDOUS WASTE

STORAGE

UNDERGROUND INJECTION CONTROL PUBLIC WATER SYSTEM/SUPPLY

WATER LICENSING

IHW CORRECTIVE ACTION

PERMIT PERMIT

50117

50117

Rating Date: 9/1/2006 Repeat Violator: NO

PERMIT REGISTRATION

1011578 1011578

LICENSE SOLID WASTE REGISTRATION # (SWR)

WDW036 30030

Location:

8280 SHELDON RD BLDG 1, CHANNELVIEW, TX, 77530

TCEQ Region:

**REGION 12 - HOUSTON** 

Date Compliance History Prepared:

April 27, 2007

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

April 27, 2002 to April 27, 2007

Name

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History Bryan Elliott

Phone:

239-6162

#### **Site Compliance History Components**

1. Has the site been in existence and/or operation for the full five year compliance period?

2. Has there been a (known) change in ownership of the site during the compliance period?

No

3. If Yes, who is the current owner?

4. if Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

N/A N/A

## Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 11/02/2002

ADMINORDER 2001-1516-AIR-E

Classification: Moderate

Citation:

40 CFR Part 61, Subpart FF 61.342(c)(1)(ii)

40 CFR Part 61, Subpart FF 61.343(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to prevent unauthorized emissions as a result of a spill from a permitted tank.

Effective Date: 04/13/2003

ADMINORDER 1999-1410-AIR-E

Classification: Moderate

30 TAC Chapter 115, SubChapter B 115.112(a)(1) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to have the required vapor recovery system or submerged fill pipe at the time of inspection on

Tank No. 6901 in VOC service. Classification: Moderate

30 TAC Chapter 115, SubChapter C 115.216(4)(B)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to keep copies of each marine vessel's certification of annual vapor tightness tests for

marine loading operations at the Plant.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter D 115.356(1)(F)

30 TAC Chapter 115, SubChapter D 115.356(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to maintain calibration records for VOC monitoring instruments for two years. Calibration records from the first, second and fourth quarters of 1997 and the first quarter of 1998 were unavailable.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT W 61.275(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit results of seal inspections for Tanks 3111A, 3111B, 3113 and 4916 w/i 60 days after Equistar completed the seal inspections on April 21 thru April 27, 1998.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1)

40 CFR Part 60, Subpart Kb 60.115b(b)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a seal inspection report for Tank No. 4922 and Tank No. 33 within 60 days of

inspection.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter D 115.354(2)[G] 30 TAC Chapter 115, SubChapter D 115.355(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-2(a) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(f) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245(b)

40 CFR Part 60, Subpart VV 60.482-2[G] 40 CFR Part 60, Subpart VV 60.482-7[G] 40 CFR Part 61, Subpart V 61.242-7(a) 40 CFR Part 61, Subpart V 61.245(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly monitor fugitive emissions for several units, including the Olefins Plant I and Tank Farm, Olefins Plant II and Tank Farm, Butadiene Plants E and W, Barge Dock, Benzene/Toluene Unit, East Tank

Farm, LMTBE Unit and the MeOH Unit.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.114(a)(2) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to perform seal gap measurements on Tanks TK-26, TK-3115, TK-3112, and TK-4921 on an

annual basis in 1998. Classification: Moderate

Citation:

5C THC Chapter 382, SubChapter A 382.0518[G] 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification as requird by Standard Exemption 106 (effective August 25, 1986) when

the 1200 Unit was modified to produce a new product.

Effective Date: 12/02/2006

ADMINORDER 2006-0515-AIR-E

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: S.C. 1 PERMIT

Description: Fallure to prevent the release of unauthorized emissions from an aboveground storage tank pressure

safety valve.

Any criminal convictions of the state of Texas and the federal government.

N/A

Chronic excessive emissions events. C.

- The approval dates of investigations. (CCEDS Inv. Track. No.) D.
  - (1339)1 05/22/2002
  - 2 05/22/2002 (1314)
  - (156277) 3 05/23/2002
  - 4 06/05/2002 (2105)
  - (2233)5 06/10/2002
  - 06/12/2002 (1611)6
  - (2701)7 06/24/2002
  - 8 06/24/2002 (156281)
  - (2914) 9 06/24/2002
  - 10 07/19/2002 (5534)
  - (5345)11 07/19/2002
  - (4814) 12 07/19/2002
  - (4569)13 07/19/2002 (156285)
  - 14 07/23/2002 (5089)15 07/31/2002

  - (4981) 16 08/01/2002
  - (6606)17 08/02/2002
  - 08/06/2002 (7028)18
  - (7144)19 08/06/2002
  - (7204)20 08/06/2002 (7234)21 08/06/2002
  - 22 08/07/2002 (7141)

  - (2391)23 08/08/2002
  - 24 08/09/2002 (2626)(7549)25 08/09/2002
  - 26 08/09/2002 (4157)
  - 27 08/09/2002 (5980)
  - 28 08/09/2002 (2387)
  - (6957)29 08/12/2002
  - 30 08/13/2002 (7700)31 08/16/2002 (5841)
  - 32 08/19/2002 (8124)

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    38 08/30/2002
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    40 09/04/2002
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    41 09/10/2002
                      (10385)
   42 09/18/2002
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   43 09/23/2002
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   44 10/21/2002
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  186 11/23/2004
                       (351832)
  187 11/23/2004
                       (334429)
  188 11/29/2004
                      (274800)
  189 12/06/2004
                      (275639)
  190 12/06/2004
                      (341908)
  191 12/09/2004
                      (343543)
  192 12/14/2004
                      (339112)
  193 12/15/2004
                      (339111)
  194 12/27/2004
                      (381708)
  195 12/27/2004
                      (276826)
  196 12/28/2004
                      (343601)
  197 01/03/2005
                      (286756)
  198 01/03/2005
                      (339113)
  199 01/04/2005
                      (339104)
  200 01/05/2005
                      (339108)
  201 01/07/2005
                      (339103)
  202 01/10/2005
                      (343232)
  203 01/12/2005
                      (346553)
  204 01/18/2005
                      (336265)
 205 02/10/2005
                      (349636)
 206 02/10/2005
                      (349316)
 207 02/10/2005
                      (349111)
 208 02/10/2005
                      (337111)
 209 02/10/2005
                      (349267)
 210 02/11/2005
                      (336418)
 211 02/11/2005
                      (336433)
 212 02/11/2005
                     (336438)
 213 02/17/2005
                      (343594)
 214 02/23/2005
                     (381706)
 215 02/25/2005
                     (345588)
 216 03/03/2005
                     (339106)
 217 03/22/2005
                     (381707)
 218 03/28/2005
                     (375234)
 219 03/28/2005
                     (375220)
 220 03/28/2005
                     (375212)
 221 03/31/2005
                     (373125)
 222 04/06/2005
                     (375076)
 223 04/18/2005
                     (375016)
 224 04/20/2005
                     (376147)
 225 04/20/2005
                     (372583)
 226 04/22/2005
                     (346277)
 227 04/25/2005
                     (377509)
 228 05/03/2005
                     (419501)
 229 05/24/2005
                     (419502)
 230 06/14/2005
                     (393497)
 231 06/21/2005
                     (419503)
 232 06/22/2005
                     (381407)
 233 06/22/2005
                     (392621)
 234 06/23/2005
                     (378466)
235 06/23/2005
                     (378454)
 236 07/15/2005
                     (395098)
237 07/18/2005
                     (392902)
238 07/22/2005
                     (392487)
239 07/22/2005
                     (381313)
240 07/22/2005
                     (392651)
241 07/22/2005
                     (394428)
242 07/25/2005
                     (440656)
243 07/26/2005
                     (399215)
244 08/05/2005
                    (381400)
245 08/05/2005
                     (392610)
246 08/05/2005
                    (393207)
247 08/11/2005
                     (404370)
248 08/11/2005
                    (404367)
249 08/11/2005
                    (404342)
250 08/11/2005
                    (404321)
251 08/12/2005
                    (399221)
252 08/15/2005
                    (404957)
253 08/23/2005
                    (440657)
254 08/24/2005
                    (406415)
255 08/26/2005
                    (372787)
256 08/29/2005
                    (406161)
257 09/13/2005
                    (431694)
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(440658)
258 10/24/2005
                    (440659)
259 10/26/2005
                    (434603)
260 11/15/2005
                    (437299)
261 11/18/2005
                    (468155)
262 11/22/2005
                    (468154)
263 11/28/2005
                    (435325)
264 12/01/2005
265 12/08/2005
                    (434728)
266 12/19/2005
                    (438915)
                    (468156)
267 12/21/2005
268 02/15/2006
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269 02/22/2006
                    (450109)
                    (451477)
270 02/24/2006
271 02/27/2006
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272 02/28/2006
                    (451452)
273 02/28/2006
                    (451480)
274 02/28/2006
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275 02/28/2006
                     (451483)
276 02/28/2006
                     (451494)
277 03/13/2006
                     (454890)
                     (498017)
278 03/23/2006
279 03/24/2006
                     (457373)
                     (453139)
 280 03/28/2006
                     (459500)
 281 03/29/2006
 282 03/31/2006
                     (455940)
                     (498018)
 283 04/24/2006
 284 04/28/2006
                     (462755)
                     (463873)
 285 05/16/2006
                     (498019)
 286 05/23/2006
                     (466508)
 287 05/23/2006
                     (465260)
 288 05/24/2006
                     (480441)
 289 05/31/2006
                     (480422)
 290 05/31/2006
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 291 05/31/2006
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 292 05/31/2006
                     (480427)
 293 05/31/2006
                     (480444)
 294 05/31/2006
                     (498020)
 295 06/21/2006
                     (464019)
 296 06/26/2006
                     (483427)
 297 06/30/2006
                     (484895)
 298 07/07/2006
                      (464664)
 299 07/17/2006
                      (460500)
 300 07/17/2006
                     (480415)
 301 07/19/2006
 302 07/20/2006
                      (486401)
                      (520033)
 303 07/24/2006
 304 07/28/2006
                      (484749)
 305 08/04/2006
                      (339110)
                      (482128)
 306 08/15/2006
                      (481194)
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  308 08/15/2006
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  309 08/16/2006
  310 08/21/2006
                      (520034)
                      (510768)
  311 09/01/2006
                      (486742)
  312 09/05/2006
                      (520035)
  313 09/25/2006
                      (488324)
  314 10/04/2006
                      (544282)
  315 10/24/2006
                      (516667)
  316 11/21/2006
                      (544283)
  317 11/27/2006
  318 11/30/2006
                      (531615)
                      (519152)
  319 12/11/2006
                      (544284)
  320 12/19/2006
                      (535494)
  321 12/29/2006
                      (544285)
  322 01/23/2007
                      (538091)
  323 01/30/2007
                      (537102)
  324 01/31/2007
                      (517108)
  325 01/31/2007
  326 01/31/2007
                       (537091)
                       (537099)
  327 01/31/2007
                       (538420)
  328 02/08/2007
                       (485046)
  329 02/22/2007
                       (532597)
  330 02/27/2007
                       (532595)
  331 03/21/2007
  332 04/05/2007
                       (532607)
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333 04/10/2007
                             (532608)
       334 04/12/2007
                             (541831)
       335 04/12/2007
                             (554839)
       336 04/23/2007
                             (539454)
Written notices of violations (NOV). (CCEDS Inv. Track. No.)
          Date 06/30/2002
                                  (156285)
          Self Report?
                                                                                Classification:
                                                                                                    Moderate
                             30 TAC Chapter 305, SubChapter F 305.125(1)
          Citation:
                             TWC Chapter 26 26,121(a)[G]
          Description:
                             Failure to meet the limit for one or more permit parameter
          Date 07/31/2002
                                  (156288)
          Self Report?
                                                                                Classification:
                                                                                                    Moderate
          Citation:
                             30 TAC Chapter 305, SubChapter F 305.125(1)
                             TWC Chapter 26 26.121(a)[G]
          Description:
                             Failure to meet the limit for one or more permit parameter
         Date 09/30/2002
                                 (156294)
         Self Report?
                                                                                Classification:
                                                                                                   Moderate
         Citation:
                             30 TAC Chapter 305, SubChapter F 305.125(1)
                             TWC Chapter 26 26.121(a)[G]
         Description:
                            Failure to meet the limit for one or more permit parameter
         Date 10/31/2002
                                 (156298)
         Self Report?
                                                                                Classification:
                                                                                                   Moderate
         Citation:
                            30 TAC Chapter 305, SubChapter F 305.125(1)
                            TWC Chapter 26 26.121(a)[G]
         Description:
                            Failure to meet the limit for one or more permit parameter
         Date 01/27/2003
                                 (15704)
         Self Report?
                                                                                Classification:
                                                                                                   Moderate
         Citation:
                            30 TAC Chapter 101, SubChapter F 101.222(b)(2)
                            30 TAC Chapter 116, SubChapter B 116.115(b)(2)[G]
        Description:
                            Failure to control emissions.
        Date 01/31/2003
                                 (156266)
        Self Report?
                                                                               Classification:
                                                                                                   Moderate
        Citation:
                            30 TAC Chapter 305, SubChapter F 305.125(1)
                            TWC Chapter 26 26.121(a)[G]
        Description:
                            Failure to meet the limit for one or more permit parameter
        Date 02/10/2003
                                (24871)
        Self Report?
                                                                                Classification:
                                                                                                   Moderate
        Citation:
                           30 TAC Chapter 101, SubChapter F 101.222(b)(2)
                            30 TAC Chapter 116, SubChapter B 116.115(b)(1)
        Description:
                           Failure to prevent unauthorized emissions.
        Date 02/28/2003
                                (156269)
        Self Report?
                                                                               Classification:
                                                                                                   Moderate
        Citation:
                           30 TAC Chapter 305, SubChapter F 305.125(1)
                           TWC Chapter 26 26.121(a)[G]
        Description:
                           Failure to meet the limit for one or more permit parameter
        Date 03/07/2003
                                (9862)
        Self Report?
                                                                               Classification:
                                                                                                   Minor
        Citation:
                           30 TAC Chapter 101, SubChapter A 101.7(b)(1)(G)
                           30 TAC Chapter 101, SubChapter A 101.7(c)(7)
        Description:
                           Failure to document the actions taken to minimize emissions in both the initial and final
                           notification records for a start-up event on 02/16/2002.
        Date 03/31/2003
                                (156274)
        Self Report?
                                                                               Classification:
                                                                                                  Moderate
        Citation:
                           30 TAC Chapter 305, SubChapter F 305.125(1)
                           TWC Chapter 26 26.121(a)[G]
        Description:
                           Failure to meet the limit for one or more permit parameter
        Date 04/11/2003
        Self Report?
                                                                               Classification:
                                                                                                  Moderate
        Citation:
                           30 TAC Chapter 101, SubChapter F 101.222(b)(3)
                           30 TAC Chapter 116, SubChapter B 116.115(b)(1)
       Description:
                           Failure to prevent unauthorized emissions
       Date 04/30/2003
                               (156278)
       Self Report?
                                                                              Classification:
                                                                                                  Moderate
       Citation:
                           30 TAC Chapter 305, SubChapter F 305.125(1)
                           TWC Chapter 26 26.121(a)[G]
       Description:
                           Failure to meet the limit for one or more permit parameter
       Date 05/31/2003
                               (156282)
       Self Report?
                                                                              Classification:
                                                                                                  Moderate
       Citation:
                          30 TAC Chapter 305, SubChapter F 305.125(1)
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TWC Chapter 26 26.121(a)[G]

(294651)

Failure to meet the limit for one or more permit parameter

Description:

Date 07/31/2003

Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description: (294653) Date 08/31/2003 Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description: (294655)Date 09/30/2003 Moderate Classification: Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description: (248879) Date 10/01/2003 Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Failure to comply with the MAERT limit for EPN: 44E10. Description: (248243) Date 10/01/2003 Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Failure to comply with the MAERT limit. Description: 10/01/2003 Date (249082)Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.116(a)(1) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) Failure to torque the flange properly which resulted in unauthorized emissions. Description: (249144)Date 10/01/2003 Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Failure to comply with the MAERT limit for EPN 17E01 Description: 10/01/2003 (249301)Date Moderate Classification: Self Report? 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Failure to comply with permit limit for VOC, CO and NO (EPN: 48E01). Description: (249012) Date 10/01/2003 Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Failure to comply with the MAERT limit for EPN 6E07 Description: 10/01/2003 (249172)Date Classification: Moderate Self Report? 30 TAC Chapter 101, SubChapter F 101.201(a)(1)[G] Citation: Failure to submit the initial report within 24 hours. Description: 10/01/2003 (248981)Date Moderate Classification: Self Report? 30 TAC Chapter 116, SubChapter B 116.116(a)(1) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) Failure to comply with the state rule 30 TAC 116.116(a)(1) which resulted in Description: unauthorized emissions. Date 02/29/2004 (294642)Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description: (260492)Date 07/13/2004 Classification: Moderate Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

PERMIT TCEQ AIR PERMIT #1768, SC #1 Rqmt Prov: Exceeded VOC emissions limits during an avoidable emissions event. Description: (260586)Date 07/19/2004 Minor Classification: Self Report? 30 TAC Chapter 101, SubChapter F 101.201(b)(4) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) Failed to identify the facility name in an emissions event notification. Classification: Minor

Description:

Self Report? 30 TAC Chapter 101, SubChapter F 101.201(g)

Citation: Equistar failed to submit an electronic final emissions event notification. Description: (259476) Date 07/28/2004

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Exceeded permit limits during an avoidable emissions event.

Date 08/11/2004 (263553)

(265746)

Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G)

Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(7) 5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Failed to speciate VOC in the Initial Notification and Final Report submitted for an

avoidable emissions event.

Date 08/27/2004

Self Report?

Classification:

Classification:

Minor

Moderate

Moderate

Citation:

Citation:

Citation:

Description:

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D) 30 TAC Chapter 101, SubChapter F 101.201(b)(4)

Description: Self Report?

Equistar failed to properly complete and submit an emissions event notification.

Classification:

30 TAC Chapter 116, SubChapter B 116.115(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Equistar exceeded permit limits during an avoidable emissions event.

Date 08/29/2004

(268291)

Classification:

Moderate

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Equistar exceeded VOC permit limit. Date 08/31/2004

(272796)

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H) 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Date 08/31/2004 Failed to submit adminstratively complete emissions event notifications. (271963)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 101, SubChapter F 101.211(a)(1)(F) 30 TAC Chapter 101, SubChapter F 101.211(b)(5) 30 TAC Chapter 116, SubChapter B 116.115(c)

Description:

Equistar was not in compliance with the maintenance, startup, and shutdown rules.

Date 10/31/2004

(351832)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Description: Date 12/27/2004

Failure to meet the limit for one or more permit parameter (276826)

Self Report?

Classification:

Moderate

Citation: Ramt Prov: 30 TAC Chapter 116, SubChapter B 116.115(b) 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT TCEQ Air Permit No. 2933, GC #8

Description:

Exceeded permit limits during an avoidable emissions event.

Date 01/03/2005

(286756)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382 085(b)

**PERMIT 22779** 

Ramt Prov:

Description:

Equistar failed to prevent an avoidable emissions event.

Date 01/04/2005

(339104)

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) 5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Equistar failed to prevent an avoidable emissions event.

Date 01/10/2005 (343232)

Self Report?

Classification:

Minor

Minor

Minor

Citation:

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)

Description: Self Report? Failure to provide an adequate ground storage capacity

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)

Description:

Date 04/20/2005

Failure to provide a minimum pressure tank capacity of 220 gallons. (372583)

Self Report?

Classification:

Description:

Citation:

30 TAC Chapter 101, SubChapter F 101.201(g) Equistar failed to submit the Final Report electronically.

Self Report?

Classification:

Moderate

Citation:

Ramt Prov

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

PERMIT Permit No. 22779, Special Condition No.1 Equistar failed to prevent an avoidable emissions event.

Date 08/05/2005

Minor Classification: Self Report?

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II) Citation:

Failure to test within 60 days following installation of NOx control equipment on furnace Description:

Date 08/05/2005 (393207)

Self Report?

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Description:

Failure to test within 60 days following installation of NOx control equipment on Furnace

Minor

Minor

Minor

Minor

Moderate

Minor

Minor

Minor

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

4406.

NO Self Report?

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation:

Failure to test within 60 days following installation of NOx control equipment on F4410. Description:

Self Report?

Citation:

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description:

Failure to test within 60 days following installation of NOx control equipment on Furnace

NO Self Report?

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Failure to test within 60 days following installation of NOx control equipment on Furnace Description:

Date 08/05/2005 (392610)

Self Report?

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Failure to test within 60 days following installation of NOx control equipment on Furnace Description:

4404

(404514) Date 08/10/2005

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

PERMIT TCEQ Permit #2128, GC #8 Ramt Prov: Failure to prevent a leak in Tower T-301.

Description: (431694) Date 09/13/2005

Self Report?

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(II) Citation:

Failure to provide an adequate ground storage capacity Description:

Classification: Self Report?

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v) Citation: Failure to provide a minimum pressure tank capacity of 220 gallons.

Description: (437299)

11/18/2005

Classification: Minor Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

PERMIT 3130A, SC No. 4 Rgmt Prov:

OP O02179, ST&C No. 10

Failure to operate within pumping rates of Polyols(KOH) and (IMPACT). Description: Classification: Self Report?

30 TAC Chapter 117, SubChapter B 117.213(a)[G] Citation:

Failure to install the totalizing fuel flow meter on EGBVC6904. Description:

(434728)12/08/2005 Date

Minor Classification: Self Report?

30 TAC Chapter 122, SubChapter C 122.222(k)(3) Citation: Failure to submit the off-permit notification for claiming the permit by rule for flare Description:

emissions. Classification: Minor

NO Self Report?

Rqmt Prov:

30 TAC Chapter 106, SubChapter K 106.261(a)(6)

Citation: Failure to register the PBR within 10 of increase in flare emissions. Description:

Moderate Classification: Self Report?

30 TAC Chapter 101, SubChapter A 101.20(1) Citation:

30 TAC Chapter 115, SubChapter D 115.352[G] 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)

PERMIT 49130, S.C. No.5 Ramt Prov: OP O-02180, S.C No.1A

Failure to follow the fugitive monitoring for 172 valves and 5 pumps in the Isopropanol Description:

Minor Classification: Self Report?

30 TAC Chapter 115, SubChapter D 115.354(5) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) OP O-02180, SC. 1.A

Failure to have required information on tags attached to visual fugitive leaks Description:

Self Report? Classification: Moderate 30 TAC Chapter 101, SubChapter A 101,20(2) Citation: 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) Rqmt Prov: PERMIT 49130, SC 5.E OP O-02180, SC 1.A Description: Failure to cap or plug the five open-ended lines in VOC service Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) PERMIT 49130, S.C 7 Ramt Prov: OP O-02180, S.C 11 Description: Failure to follow the procedure described in Appendix P, Section 5.5.1 for monitoring the cooling tower (CT-2401) as required by the permit condition Self Report? Classification: Moderate 30 TAC Chapter 122, SubChapter B 122.145(2)(A) Citation Description: Failure to report the deviations regarding the cooling tower monitoring in the deviation reports (438915) Date 12/19/2005 Self Report? Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter C 122.210(a) Description: Failure to submit the federal operating permit (O-02177) minor revision application concurrent with the permit amendment issued on July 26, 2005 and permit by rules claimed in 1997 and 2002. Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) Ramt Prov PERMIT 22779, SC 1 OP O-02177, STC 10 Description: Failure to operate tanks and loading arms within maximum allowable emission rates as permitted in the NSR permit 22779. Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) Rqmt Prov: PERMIT 22779, SC 8 OP O-02177, STC 10 Description: Failure to initiate the fugitive monitoring for 22 valves and 3 pumps in the Polybutadiene Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) Rgmt Prov: PERMIT 22779, SC 8.E OP O-02177, STC 10 Description: Failure to cap or plug the five open-ended lines in VOC service Date 12/31/2005 (440659) Self Report? Classification: Moderate Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G] Description: Failure to meet the limit for one or more permit parameter Date 02/22/2006 (450109)Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) Rqmt Prov: PERMIT 24887 SC1.E OP 002176, SC 15 Failure to cap or plug the eighty five (85) open-ended lines in VOC service Description: Self Report? Classification: Minor Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(4) 30 TAC Chapter 122, SubChapter C 122.222(k)(3) Description: Failure to register the PBRs 106.261 and 106.262 within 10 days of addition of a flare analyzer and failure to make off-permit notification concurrently. Self Report? NC Classification: Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)(B)[G] Description: Failure to represent the several sources that are subject to 30 TAC 111 rules in the Title V Operating Permit. Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) Rqmt Prov: PERMIT 24887, SC 1 OP 002176, SC 15 Description: Failure to include 19 valves and 39 connectors associated with sample systems

> and failure to include 5 pumps, 38 valves, 104 connectors, and 4 sample points in the fugitive monitoring database.

> > Moderate

Classification:

Self Report?

Citation: 30 TAC Chapter 115, SubChapter B 115.142[G]

30 TAC Chapter 122, SubChapter B 122.143(4) Rgmt Prov: OP 002176, SC 5

Failure to control the wastewater streams as required by 30 TAC 115.142 Description: Classification: NO Self Report? 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(5) OP 002176, SC 1.A Rgmt Prov: Failure to make the tank seal inspection notification 30 days in advance. Description: Date 02/28/2006 (451788) Minor Classification: Self Report? 30 TAC Chapter 115, SubChapter D 115.352(4) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) PA NSR Permit No. 8125, SC 6E Rgmt Prov: Failure to plug two open-ended-lines. Description: Classification: Minor Self Report? NO 30 TAC Chapter 117, SubChapter B 117.213(a) Citation: Failure to install fuel flow meter on Diesel Engine, P-3314. Description: Minor Classification: Self Report? 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d) Citation: Failure to include compressor information in the HON Subpart H Semiannual report. Description: Minor Classification: NC Self Report? 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(a) Citation: Failure to maintain appropriate records of 220 connectors, 6 instrument systems, 4 Description: PSVs, 2 pumps, and 101 valves. (457373)Date 03/24/2006 Minor Classification: Self Report? 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii) Citation: Fallure to provide an adequate ground storage capacity Description: Minor Classification: NO Self Report? 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v) Citation: Failure to provide a minimum pressure tank capacity of 220 gallons. Description: (453139)Date 03/28/2006 Classification: Minor Self Report? 30 TAC Chapter 115, SubChapter D 115.352(4) Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter A 382.085(b) PA NSR Permit No 2936, SC 10E Rqmt Prov: OP O-02182 Special Terms and Condition 15 Failed to plug 20 open-ended lines. Description: Minor Classification: Self Report? 30 TAC Chapter 116, SubChapter B 116.110(a)(4) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter C 122.222(k)(2) 5C THC Chapter 382, SubChapter A 382.085(b) OP O-02181 General Terms and Condition Ramt Prov: The facility falled to register two tanks and one cooling tower within ten (10) days of Description: change as required during August 19, 2004 through November 22, 2004. NC Self Report? 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d) 5C THC Chapter 382, SubChapter A 382.085(b) OP O-02182 General Terms and Condition Rqmt Prov: Failure to include compressor information in the HON Subpart H semiannual report for Description: the reporting period from February 28, 2005 through August 19, 2005. Classification: Minor NO Self Report? 30 TAC Chapter 115, SubChapter D 115.354(2)(C) Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b) 5C THC Chapter 382, SubChapter A 382.085(b)

30 TAC Chapter 115, SubChapter D 115.354(5) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b) OP General Terms and Condition Rqmt Prov: Description: through August 19, 2005.

PA Special Condition No. 10F

OP Special Terms and Condition 15

failure to put identification number for the leaking fugitive valves during August 19, 2004

quarter of 2004 form August 19, 2004 through September 30, 2004

failure to monitor 59 valves that were marked as unsafe to monitor during the third

Minor

Rgmt Prov:

Description:

Self Report?

Minor Classification: Self Report? 30 TAC Chapter 115, SubChapter D 115.354 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov

OP Special Terms and Condition 15

Description:

failure to include 89 connectors, 27 valves, and 19 pumps in the fugitive monitoring

program during the third quarter of 2004 form August 19, 2004 through September 30,

Self Report?

Classification:

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

OP General Terms and Condition

Description:

failure to obtain a permit by rule (PBR) for the emission point no. SP-4010.

Self Report? NO

Classification: Minor

Citation:

Rqmt Prov:

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

OP General Terms and Conditions

Description:

faiure to seal the external floating roof tank, TK-3112. The gasket on the rim vent was

missina.

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PA SC No 1 of NSR Permit No. 2936 OP Special Terms and Conditions 15

Description:

failure to obtain appropriate authorization for storing hydrocarbons for the tanks, TK-

3113 and TK-3114

Self Report?

Classification:

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382 085(b)

PA Special Condition 1

OP Special Terms and Condition 15

Rqmt Prov: Description:

failure to comply with the pounds per hour of VOC emission limit for tank No. TK-4002 of

TCEQ Air Permit 2936.

Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov: Description:

Citation:

OP General Terms and Conditions failure to obtain a permit by rule (PBR) for the analyzer vent.

Self Report? NO Classification:

Minor

Minor

Citation:

30 TAC Chapter 122, SubChapter B 122.132(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Failure to include all the emission authorizations for the cooling tower were not represented in the title V permit.

(459500)

Date 03/29/2006 Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

PERMIT TCEQ Permit No. 2128

Description:

Failure to prevent the release of unauthorized emissions from a railroad tank car PSV.

Date 03/31/2006

(455940)

Self Report?

30 TAC Chapter 122, SubChapter B 122.142(b)(2)[G]

Classification: Minor

5C THC Chapter 382, SubChapter D 382,085(b)

Description:

Failure to represent the two sources that are subject to 30 TAC 111 rules in the Title V

Operating Permit O-02175.

Self Report?

Classification:

Moderate

Citation:

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

PERMIT 6245, SC 1 OP 002175, STC 10

Description:

Failure to operate tanks (TK30 & TK31) within maximum allowable emission rates as

permitted in the NSR permit 6245.

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT 6245, SC 7.E OP 002175, STC 10

OP 002175, STC 1A

Description:

Failure to cap or plug the thirty-eight (38) open-ended lines in VOC service (C5 recovery

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1)

```
30 TAC Chapter 122, SubChapter B 122.143(4)
                  40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a)
                   5C THC Chapter 382, SubChapter D 382.085(b)
Rqmt Prov:
                   OP 002175, STC 1A
                   Failure to equip the dimer drum feed sampling connection system with closed loop
Description:
                                                                       Classification:
                                                                                          Minor
               NO
Self Report?
                   30 TAC Chapter 101, SubChapter A 101.20(1)
Citation:
                   30 TAC Chapter 115, SubChapter D 115.354(5)
                   30 TAC Chapter 122, SubChapter B 122.143(4)
                   40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1)
                   5C THC Chapter 382, SubChapter D 382.085(b)
                   OP 002175, STC 1A
Rqmt Prov:
                   Failure to have required information on tags attached to visual fugitive leaks
Description:
                                                                       Classification:
Self Report?
                   30 TAC Chapter 101, SubChapter A 101.20(1)
Citation:
                   30 TAC Chapter 115, SubChapter D 115.352[G]
                   30 TAC Chapter 116, SubChapter B 116.115(c)
                   30 TAC Chapter 122, SubChapter B 122.143(4)
                   40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)
                   5C THC Chapter 382, SubChapter D 382.085(b)
                   PERMIT 6245, SC 7
Rgmt Prov:
                   OP 002175, STC 10
                   OP 002175, STC 1A
                   Failure to include 2 pumps, 32 valves, and 103 connectors in the C5 recovery unit in
 Description:
                   fugitive monitoring database.
                        (463873)
 Date 05/16/2006
                                                                        Classification:
                                                                                           Moderate
 Self Report?
                    30 TAC Chapter 116, SubChapter B 116.115(c)
 Citation:
                    5C THC Chapter 382, SubChapter A 382.085(b)
                    PERMIT TCEQ Permit No. 2128
 Rqmt Prov:
                    Failure to prevent the release of unauthorized emissions from a leaking pipeline due to
 Description:
                    the removal of a blind.
                        (465260)
 Date 05/24/2006
                                                                                            Moderate
                                                                        Classification:
 Self Report?
                    30 TAC Chapter 122, SubChapter B 122.142(b)(2)[G]
 Citation:
                    5C THC Chapter 382, SubChapter D 382.085(b)
                    Failure to correctly represent the HON storage vessel provisions, HON container
 Description:
                    provisions, and 30 TAC 111 rules in the Title V Operating Permit O-02185.
                                                                        Classification:
                                                                                            Moderate
 Self Report?
                NO
                    30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
 Citation:
                    30 TAC Chapter 116, SubChapter B 116.115(c)
                    30 TAC Chapter 122, SubChapter B 122.143(4)
                    40 CFR Part 63, Subpart G 63.119(c)(2)(li)
                    5C THC Chapter 382, SubChapter D 382.085(b)
                    OP O-02185, STC 16
 Rqmt Prov:
                    OP O-02185, STC 1A
                    PERMIT Permit 6387, SC 2
                    Failure to equip gasket on sample hatch cover and failure to have physical fasteners on
  Description:
                    float well cover on external floating roof tank (Tank 26).
                                                                         Classification:
  Self Report?
                    30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A) 30 TAC Chapter 116, SubChapter B 116.115(c)
  Citation:
                     30 TAC Chapter 122, SubChapter B 122.143(4)
                     40 CFR Part 63, Subpart G 63.119(b)(6)
                     PERMIT 6387, SC 2
  Rgmt Prov:
                     OP O-02185, STC 16
                     OP O-02185, STC 1A
                     Failure to cover all the openings on internal floating roof tanks: Tank 37 and Tank 47
  Description:
                     and failure to have physical fasteners on float well covers on internal floating roof tanks:
                     Tank 37, 48, and 49.
                                                                         Classification:
                                                                                             Moderate
  Self Report?
                     30 TAC Chapter 116, SubChapter B 116.115(c)
  Citation:
                     30 TAC Chapter 122, SubChapter B 122.143(4)
                     40 CFR Part 63, Subpart G 63.119(b)(1)[G]
                     5C THC Chapter 382, SubChapter D 382.085(b)
                     PERMIT 6387, SC 2
   Rqmt Prov:
                     OP O-02185, STC 1.A
                     OP O-02185, STC 16
                     Failure to keep the floating roof of Tank 47 always in contact with liquid surface during
   Description:
                     the regular operations.
                                                                          Classification:
                                                                                             Moderate
   Self Report?
                     30 TAC Chapter 116, SubChapter B 116.110(a)
   Citation:
                     30 TAC Chapter 116, SubChapter B 116.115(c)
                     30 TAC Chapter 122, SubChapter B 122.143(4)
                     5C THC Chapter 382, SubChapter D 382.085(b)
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**PERMIT 6387, SC 4.A** 

OP O-02185, STC 16

Failure to obtain authorization for the emissions resulted from analyzer vents in the

Ramt Prov:

Description:

MTBE Unit

Self Report? NO

Classification:

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov:

PERMIT 6387, SC 2 OP O-02185, STC 1.A

OP O-02185, STC 16

Description: Failure to cap or plug the sixty-one (61) open-ended lines in VOC service in MTBE Unit.

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

OP O-02185, STC 1.A

Description:

Failure to have required information on tags attached to visual fugitive leaks in the

MTBE Unit.

Self Report? NO

Classification:

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352[G] 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(a)[G]

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

PERMIT 6387, SC 5 OP O-02185, STC 1.A OP 0-02185, STC 16

Description:

Failure to include 2 valves in the MTBE Unit in fugitive monitoring database and comply

with the fugitive monitoring requirements.

Self Report? NO

Classification:

Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.142[G] 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382,085(b)

Ramt Prov.

OP O-02185, SC 5

Description: Failure to control the one wastewater stream (T-1215) as required by 30 TAC 115.142 in

MTBE Unit.

Self Report?

Classification:

Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(C)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(9) PERMIT 6387, SC 2

Rgmt Prov:

OP 0-02185, STC 1.A OP O-02185, STC 16

Description:

Failure to make the tank seal inspection (Tank-26) notification 30 days in advance in

MTBE Unit.

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov

PERMIT 6387, SC 2 OP O-02185, STC 1.A OP O-02185, STC 16

Description:

Failure to comply with HON process wastewater provisions for two containers in MTBE

Unit.

Date 06/26/2006 (464019)

Self Report?

Classification:

Moderate

Citation: Ramt Prov: 30 TAC Chapter 319, SubChapter A 319.7(a)[G]

Description:

PERMIT 00391-000

Failure to document the sample collection time and the identify of the sample personnel

24 hour composite samples (484749)

Date 07/28/2006

Self Report?

Classification:

Moderate

Citation: Ramt Prov: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter D 382.085(b) PERMIT No. 22779, Special Condition No. 1 Equistar failed to prevent this emissions event

Description: Date 08/15/2006

(489890)

for the Outfall 001

Classification:

Self Report? Citation:

30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Date 08/16/2006 Failure to update Notice of Registration

Self Report?

(457265)

Classification:

Moderate

Minor

Citation:

30 TAC Chapter 115, SubChapter C 115.212(a)(1)[G]

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

5C THC Chapter 382, SubChapter D 382.085(b) Failure to control emissions from drum D3075 and from tank TK20. Description: Moderate Classification: Self Report? 30 TAC Chapter 115, SubChapter D 115.352(4) Citation: 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) **PERMIT 2128, SC 10E** Ramt Prov: OP O-02184, ST&C 18 OP O-02184, ST&C 1A Failure to cap or plug 174 open ended lines in VOC service. Description: Classification: Moderate NO Self Report? 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i) Citation: 5C THC Chapter 382, SubChapter D 382.085(b) Failure to have a Startup/Shutdown/Malfunction plan to address visible emissions from Description: east plant flare. Moderate Classification: Self Report? NO 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b) 5C THC Chapter 382, SubChapter D 382.085(b) OP O-02184, ST&C 1A Ramt Prov: Fallure to conduct monthly monitoring on 4 HON pumps in January 2005. Description: Classification: Moderate NO Self Report? 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.166(a) 5C THC Chapter 382, SubChapter D 382.085(b) OP O-02184, ST&C 1A Rqmt Prov: Failure to equip a sample point with a closed loop system on reactor effluent and T1204 Description: overhead. Classification: Moderate Self Report? NO 30 TAC Chapter 115, SubChapter D 115.354(5) Citation: 30 TAC Chapter 115, SubChapter H 115.782(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) OP O-02184, ST&C 1H Ramt Prov: Failure to have identification numbers on the fugitive leak tags attached to 51 Description: components. Moderate Classification: Self Report? NO 30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation: 30 TAC Chapter 122, SubChapter B 122.132(a) 5C THC Chapter 382, SubChapter D 382.085(b) Failure to authorize emissions from sampling in the tank farm. Description: Classification: Moderate Self Report? 30 TAC Chapter 115, SubChapter D 115.352(1)[G] Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) PERMIT 2128, SC 10 Rqmt Prov: OP O-02184, ST&C 18 OP O-02184, ST&C 1A Failure to include 16 pumps, 45 valves, and 292 connectors in the fugitive monitoring Description: Classification: Self Report? 30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a) 5C THC Chapter 382, SubChapter D 382.085(b) OP O-02184, ST&C 13 Rgmt Prov: Failure to control emissions from 3 wastewater streams (D-78, D-3055, D-03102). Description: (544284)Date 11/30/2006 Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description: Date 02/01/2007 (538420)Moderate Classification: Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b) PERMIT 2933 Special Condition 1 Rqmt Prov: Failure to prevent process water collection system back-up which resulted in Description: unauthorized emissions. (532608)Date 04/11/2007 Moderate Classification: Self Report? 30 TAC Chapter 122, SubChapter B 122.132(a) Citation:

5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Failure to include Polyols loading emissions in federal operating permit O-02179

Self Report? Classification: Moderate Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) OP FOP O-02179 SC 10 PA NSR 3130A SC 10D Rgmt Prov:

Description: Failure to load Styrene within the allowable rates in NSR Permit 3130A.

F. Environmental audits.

Notice of Intent Date: 05/30/2002 (32973) No DOV Associated

Notice of Intent Date: 06/20/2002

(32977)

No DOV Associated

Notice of Intent Date: 02/03/2003 (33157)

No DOV Associated

Notice of Intent Date: 07/26/2005 (453654)

No DOV Associated

Notice of Intent Date: 10/06/2005 (434934)

No DOV Associated

Notice of Intent Date: 11/28/2006 (534269)

No DOV Associated

G. Type of environmental management systems (EMSs).

Voluntary on-site compliance assessment dates. Н.

Participation in a voluntary pollution reduction program.

Early compliance.

N/A

Sites Outside of Texas

N/A

A	Pe	enalty	Calculation	on Worksh	eet (P	CW)	
Policy Revision 2 (Septer	mber 2002)	···				PCW Rev	vision March 19, 2007
DATES Assigned PCW	9-Apr-2007 28-Nov-2007	Screenir	ng 18-Apr-2007	EPA Due			
RESPONDENT/FACILITY II  Respondent E  Reg. Ent. Ref. No. F	quistar Chen						
Facility/Site Region 1				Major/Min	or Source	Major	
CASE INFORMATION  Enf./Case ID No. 3  Docket No. 2  Media Program(s) A  Multi-Media  Admin. Penalty \$ Li	007-0493-All ir		Maximum	O Enf. Co			4
		Pen	alty Calcul	ation Sectio	n		
TOTAL BASE PENALT	Y (Sum of	violation	n base penalt	ies)		Subtotal 1	\$21,400
ADJUSTMENTS (+/-) T Subtotals 2-7 are obtained	O SUBTO	<b>FAL 1</b> he Total Base	Penalty (Subtotal 1)	by the indicated percent			
Compliance Histor Notes	The penalty		ced by 42 similar	6 Enhancement NOVs, 21 dissimil order, and reduce	ar NOVs,	otals 2, 3, & 7	\$66,554
Culpability	No		09	6 Enhancement		Subtotal 4	\$0
Notes	The f	Respondent	does not meet t	he culpability criteri	a.		
Good Faith Effort (			0.			Subtotal 5	\$0
Extraordinary	Before NOV	NOV to ED	PRP/Settlement Offe	r			
Ordinary N/A	X	(mark with x	<u> </u>				

	_	Before NOV	NOV to EDFKF/3	ettierrierit Oriei				
	Extraordinary							
	Ordinary							
	N/A	×	(mark with x)				-	
			D					
	Notes	ine	Respondent does	not meet the god	od raitri criteria.			
	E						1	
				0% Enha			Subtotal 6	\$0
		Total EB Amour ost of Complian		*Capped at the	Total EB \$ Amou	ınt		***************************************
SUMO	OF SUBTOTALS	1-7				I	inal Subtotal	\$87,954
	R FACTORS AS						Adjustment	\$0
Reduces	or enhances the Final Su	btotal by the ind	cated percentage. (Er	nter number only; e.g.	-30 for -30%.)			
	Notes							
					Algar Cally, jakalasia.	Final Pe	nalty Amount	\$87,954
STATI	JTORY LIMIT AI	DJUSTME	NT		Fi	inal Asse	essed Penalty	\$87,679
	RRAL					eduction	Adjustment	-\$17,535
Reduces	the Final Assessed Pena	lty by the indicte	d percentage. (Enter r	number only; e.g. 20 f	or 20% reduction.)		ч	
	Notes		Deterral offered	for expedited set	tlement.			

PAYABLE PENALTY

\$70,144

Screening Date 18-Apr-2007

Docket No. 2007-0493-AIR-E

Respondent Equistar Chemicals, LP

Case ID No. 33070
Reg. Ent. Reference No. RN100542281
Media [Statute] Air
Enf. Coordinator

Policy Revision 2 (September 2002) PCW Revision March 19, 2007

_	Compliance History Worksheet			<b>10</b> 888888333
Compliance History Component	Site Enhancement (Subtotal 2) Number of	Enter Number Here	Adjust.	
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	42	210%	٠
	Other written NOVs	21	42%	
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	2	40%	
Órders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denia of liability, or default orders of this state or the federal government, or any final prohibitor emergency orders issued by the commission		25%	
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)		0%	
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final cour judgments or consent decrees without a denial of liability, of this state or the federa government		0%	
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%	
Emissions	Chronic excessive emissions events (number of events)	0	0%	
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)		-6%	
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilego Act, 74th Legislature, 1995 ( <i>number of audits for which violations were disclosed</i> )	U	0%	
	Ple	ase Enter Yes or No	· · · · · · · · · · · · · · · · · · ·	
	Environmental management systems in place for one year or more	No	0%	
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No No	0%	
Other	Participation in a voluntary pollution reduction program	No	0%	
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	t No	0%	
**************************************	Adjustment i	Percentage (Si	ubtotal 2)	311
Repeat Violator (Su	btotal 3)	11		
No.	Adjustment I	Percentage (Si	ubtotal 3)	0%
Compliance History	Person Classification (Subtotal 7)			
Average P	erformer Adjustment I	Percentage (Si	ubtotal 7)	0%
Compliance History	/ Summary			Ü
Compliance History Notes	The penalty was enhanced by 42 similar NOVs, 21 dissimilar NOVs, two 1660-style ord findings order, and reduced by six NOAs.	ers, and one		
	Total Adjustment Percentag	o (Subtotals 1	2 2 2 71	3119

Screening Date	•	Docke	No. 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP		Policy Re	vision 2 (September 2002)
Case ID No.			PCI	N Revision March 19, 2007
Reg. Ent. Reference No.				***************************************
Media [Statute] Enf. Coordinator				***************************************
Violation Number				***************************************
Rule Cite(s)	1	nit ("FOP") O-02178 G	eneral Terms and Conditions, 30 Tex.	***************************************
			alth & Safety Code § 382.085(b)	OM AND
Violation Description	conducted on January 2st include the following Unit FOP: MSMTK2804A,	9, 2007. Specifically, tl ID numbers, authorized MSMTK2804B, MSMT	locumented during an investigaion le Respondent reported that it failed to I under PBR during the year 2000, in its K2812, MSMTK2801, MSMTK2803, IDM2805, MSMDM2802, MSMTK2824, G.	
•			Base Penalty[	\$10,000
>> Environmental, Property a	nd Human Health Ma	ıtrix		,
	Harm			***************************************
Release OR Actual	Major Moderate	Minor		· ·
Potential			Percent 0%	outerou
>> Decrease model o Materia				***************************************
>>Programmatic Matrix Falsification	Major Moderate	Minor		***************************************
		X	Percent 1%	***************************************
Matrix Notes	The Respondent failed to p	provide less than 30% o	f the required information.	
			Adjustment \$9,900	vs.
			Γ	\$100
			L	
Violation Events				0000000
			Number of violation days	uccus
mark only one with an x	daily monthly quarterly semiannual annual single event x		Violation Base Penalty[	\$100
	One s	ingle event is recomme	nded.	
Economic Benefit (EB) for thi	s violation		Statutory Limit Test	
Estimated	I EB Amount	\$81	Violation Final Penalty Total	. \$411
		This violation Final A	ssessed Penalty (adjusted for limits)	\$411
			and the second second second second second	

	E	conomic E	Benefit W	orkst	reet	100	
Respondent	Equistar Chemi	icals, LP				1 1 1 1 1 1 1 1	
Case ID No.						94 g 2 49	
Reg. Ent. Reference No.	RN100542281						
Media						Percent Interest	Years of
Violation No.						reicent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs I	nterest Saved	Onetime Costs	EB Amount
Item Description		24.5 44					
item Description	No commas or a		E. S. P.				
Delayed Costs							
Equipment				0,0 1	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	\$0	\$0
Engineering/construction				0,0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	\$1,000	20-Aug-2004	3-Apr-2006	1.6	\$81	n/a	\$81
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs  Avoided Costs		date of the pe	rmit and the Fina	il Date is th	e date the revi	ns. The Date Requir sion was issued. one-time avoided o	12:28:11
Avoided Costs Disposal	71111	I I I I I I I I I I I I I I I I I I I	a socie policie	0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0,0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,000			TOTAL		\$81

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Screening Dat	<b>e</b> 18-Apr-2007	Docket No. 2	2007-0493-AIR-E	PCW
	nt Equistar Chemicals, LP		Policy Re	vision 2 (September 2002)
Case ID No			PCM	V Revision March 19, 2007
Reg. Ent. Reference No Media [Statute				
Enf. Coordinate				
Violation Number				
Rule Cite(				
		erms and Conditions ("STC"), 1 677, Special Condition ("SC") 1	A. and 10., New Source Review	
			alth & Safety Code § 382.085(b)	
	Exceeded permitted 6	emissions limits for tank TK-281	10, as documented during an	
**************************************		d on January 29, 2007. Specifi		
Violation Description		oc") emissions from that tank to ons per year ('tpy"), but the Res	0.04 pounds per hour ('lbs/hr")	
	emissions from the tank	c at 4.2 lbs/hr and 14 tpy since	July 15, 2005. In addition, the	
	Respondent reported tha	t it had failed to achieve the rec the vent condenser on that to	quired 90% control efficiency on	
		the vent condenser on that t	WIIIV	
			Base Penalty	\$10,000
>> Environmental, Property	and Human Health Ma	atrix		
Releas	Harm se Major Moderate	Minor		
OR Actu	P	X		
Potenti	al		Percent 25%	
>>Programmatic Matrix Falsificatio	n Major Moderate	Minor		
- Granication			Percent 0%	
Matrix Human	health or the environment h	ave been exposed to insignifica	ant amounts of pollutants not	
	j levels protective of human	health or environmental recept	ors as a result of the violation.	
		Ad	ljustment \$7,500	
				\$2,500
Violation Events				
Number of \	/iolation Events 7	638	Number of violation days	
	daily			
mark only on	monthly quarterly x		Violation Base Penalty	\$17,500
with an x	semiannual		,	
	annual			
	single event			
3250018CBB				
Seven qua		ided from the beginning date of nent screening date (April 14, 2	the violation (July 15, 2005) to	
		y		
Economic Benefit (EB) for t	his violation	S	Statutory Limit Test	
Estimat	ed EB Amount	\$1,248	Violation Final Penalty Total	\$71,925
		This violation Final Assesse	ed Penalty (adjusted for limits)	\$71,925
			<u> </u>	

Case ID No. Reg. Ent. Reference No.						en distri	
Media Violation No.	Air					Percent Interest	Years of Depreciation
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	5.0 Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			, , , , , , , , , , , , , , , , , , , ,		
Equipment				0.0	\$0	\$0	\$0
Buildings				0,0	\$0	\$0	\$0
Other (as needed)		VE 11 0005		0,0	\$0	\$0 \$1,189	\$0 \$1,248
Engineering/construction	\$10,000	15-Jul-2005	27-Apr-2007	1,8 0.0	\$59 \$0	\$1,189 n/a	\$1,248 \$0
Land Record Keeping System				0.0	\$0 \$0	n/a	\$0 \$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal		01.000.000.000		0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	Estimated co	ests for rerouting en	nissions from the t	0.0 ank to th	\$0 te flare and prepar	n/a ring and submitting	\$0 Permit by Rule
	Estimated co	on. The Date Requ	ired is the beginni	ank to th	e flare and prepar	ring and submitting exceedances, and th	Permit by Rule
Other (as needed)	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to thing date	e flare and prepar of the emissions e I the emissions to	ring and submitting exceedances, and th	Permit by Rule e Final Date is costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted intering	e flare and prepar of the emissions e the emissions to item (except for \$0	ring and submitting exceedances, and th the flare, one-time avoided of \$0	Permit by Rule e Final Date Is costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted intering 0.0 0.0	the flare and preparation of the emissions to the emission t	ring and submitting exceedances, and the flare.  one-time avoided of \$0 \$0 \$0	Permit by Rule e Final Date is costs) \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal  Personnel Inspection/Reporting/Sampling	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted of the content o	le flare and prepai of the emissions e if the emissions to litem (except for \$0 \$0	ring and submitting exceedances, and the the flare.  one-time avoided of \$0 \$0 \$0	Permit by Rule te Final Date is  costs) \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted intering 0.0 0.0	the flare and preparation of the emissions to the emission t	ring and submitting exceedances, and the flare.  one-time avoided of \$0 \$0 \$0	Permit by Rule e Final Date is costs) \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal  Personnel Inspection/Reporting/Sampling	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted recorded r	re flare and prepare for the emissions to a the emissions to the emissions to some form (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ring and submitting exceedances, and the flare.  one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Permit by Rule e Final Date is  Costs)  \$0  \$0  \$0  \$0  \$0  \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted ntering   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0	le flare and prepare of the emissions et is the emissions to litem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ring and submitting exceedances, and the flare.  one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Permit by Rule e Final Date is  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted recorded r	re flare and prepare for the emissions to a the emissions to the emissions to some form (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ring and submitting exceedances, and the flare.  one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Permit by Rule e Final Date is  costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	documentation	on. The Date Requ the dat	ired is the beginni e the Respondent	ank to the rerouted recorded r	re flare and prepare for the emissions to a the emissions to the emissions to some form (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ring and submitting exceedances, and the flare.  one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	Permit by Rule ie Final Date Is  Costs)  \$0  \$0  \$0  \$0  \$0

Screening Date	2 ·	Docket	<b>No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP		Policy F	Revision 2 (September 2002)
Case ID No.			PC	CW Revision March 19, 2007
Reg. Ent. Reference No.				
Media [Statute] Enf. Coordinator				
Violation Number				
Rule Cite(s)		0. NSRP 24677 SC 11	.F. and 13., 30 Tex. Admin. Code §§	Ī
			Ith & Safety Code § 382.085(b)	
	Failed to install runture d	isce and proceurs aguas	s on safety relief valves (EPN F28E00)	
Violation Description		hydride Unit, as docume	nted during an investigation conducted	
		on January 29,	2007.	
	L		Base Penalty	\$10,000
_				<u> </u>
>> Environmental, Property a	and Human Health Ma Harm	atrix		
Release		Minor		***************************************
OR Actual			<u> </u>	
Potential		X	Percent 10%	***************************************
>>Programmatic Matrix				
Falsification	Major Moderate	Minor		***************************************
			Percent 0%	***************************************
801.00000000000000000000000000000000000				1
			insignificant amounts of pollutants not	
Notes exceeding le	evels protective of human	health or environmental	receptors as a result of the violations.	***************************************
			Adjustment \$9,000	•
				\$1,000
Violation Events				
Violation Events				***************************************
Number of Vio	olation Events 1	181	Number of violation days	
	•	7		
	daily monthly			
mark only one	quarterly		Violation Base Penalty	\$1,000
with an x	semiannual		•	
	annual			***************************************
l	single event x			
				***************************************
	One s	single event is recommer	nded.	***************************************
				November 1
Economic Benefit (EB) for th	is violation		Statutory Limit Test	
Estimated	d EB Amount	\$31	Violation Final Penalty Total	\$9,630
		This violation Final As	ssessed Penalty (adjusted for limits)	\$9,630
			, (,	Ţ-,

	E	conomic I	3enefit W	orks	heet		
Respondent	Equistar Chem	icals, LP			4 4 5	· " · " · (1)	
Case ID No.	33070				4.	and the significant	
Reg. Ent. Reference No.	RN100542281						
Media	Air					Percent Interest	Years of
Violation No.	3						Depreciation
STREET, STREET					200	5,0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
Delayed Costs							
Egulpment				0,0	\$0	- \$0	\$0
Buildings				0,0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	i \$0	\$0
Engineering/construction	\$900	20-Aug-2005	17-Feb-2006	0.5	\$1	\$30 11	\$31
Land				0,0	\$0	n/a	\$0
Record Keeping System				0,0	\$0	n/a	\$0 \$0
Training/Sampling				0.0	\$0	n/a	\$U \$0
Remediation/Disposal				0.0	\$0 \$0	n/a n/a	\$0 \$0
Permit Costs Other (as needed)				0,0	\$0 \$0	n/a	\$0 \$0
		F 10 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	one and the Final				equired is the
Notes for DELAYED costs	pegirini	date of the violation	ing and the first	Date is t estallatio	ne date the Resp ons.	ondent reported com	pleting the
			ir sanaa ii	nstallatio	ons.		oosts)
Avoided Costs			ir sanaa ii	nstallatio	item (except for	one-time avoided o	costs)
			ir sanaa ii	ntering 0.0 0.0	item (except for \$0 \$0	one-time avoided o	costs) \$0
Avoided Costs Disposal			ir sanaa ii	nstallatio	Item (except for \$0 \$0 \$0 \$0	one-time avoided o	posts)  \$0  \$0  \$0
Avoided Costs Disposal Personnel			ir sanaa ii	nstallatio		one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	posts)  \$0  \$0  \$0  \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			ir sanaa ii	nstallatio 0.0 0.0 0.0 0.0 0.0 0.0		one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment			ir sanaa ii	ntering 0.0 0.0 0.0 0.0 0.0 0.0		one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			ir sanaa ii	nstallatio 0.0 0.0 0.0 0.0 0.0 0.0		one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			ir sanaa ii	ntering 0.0 0.0 0.0 0.0 0.0 0.0		one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

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Screening Date		Docket	<b>No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP		Policy I	Revision 2 (September 2002)
Case ID No Reg. Ent. Reference No			PC	CW Revision March 19, 2007
Media [Statute]				
Enf. Coordinator			•	
Violation Number	4			
Rule Cite(s	1 01 0 02170, 010 10.	., 30 Tex. Admin. Code § ex. Health & Safety Cod	§ 116.116(b)(1) and 122.143(4), and e § 382.085(b)	
Violation Description	representations, as docur Specifically, subseque	mented during an investi nt to the permit represer	tures for tote EPN 28E37 in the permit gation conducted on January 29, 2007 ntation of the tote's temperature, the erature without amending the permit.	
			Base Penalty	\$10,000
>> Environmental, Property a	and Human Health Ma	ıtrix		***************************************
Release	<b>Harm</b> Major Moderate	Minor		
OR Actual		Minor		0000000000
Potential			Percent 0%	***************************************
>>Programmatic Matrix				***************************************
Falsification	Major Moderate	Minor		
		X	Percent 1%	
H-H-CO-CHICAGO CONTRACTOR CONTRAC				1
Matrix Notes The Re	spondent failed to accurate	ely represent less than 3	0% of the tote's representations.	
			Adjustment \$9,900	
				#100
				\$100
Violation Events				on and a second
Number of Vio	lation Events 1	T 606	Number of violation days	duran
		<u></u>	Number of violation days	***************************************
	daily		•	***************************************
mark only one	monthly quarterly		Violation Base Penalty	\$100
with an x	semiannual		Violation base Fenalty	\$100
	annual			***************************************
	single event x			
				***************************************
	One sir	ngle event is recommend	ded,	**************************************
Economic Benefit (EB) for thi	s violation		Statutory Limit Test	
Estimated	EB Amount	\$237	Violation Final Penalty Total	\$411
•		This violation Final Ac-	speed Ponalty (adjusted for limits)	
		rma violation Final AS	sessed Penalty (adjusted for limits)	\$411

		conomic E	Sellellir AA	UINƏ	Heer		
Respondent							
Case ID No.	33070					911	No. 1
Reg. Ent. Reference No.	RN100542281						
Media	Air					Percent Interest	Years of
Violation No.							Depreciation
1 (1985)						5.0	15
particular de la company	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
u Busileden							
Item Description	No commas or a					22,222,000	
- 1 10 11							
Delayed Costs Equipment		I		0.0	\$0	\$0	\$0
Buildings				0,0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0,0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0 \$0
Training/Sampling				0.0	\$0 \$0	n/a n/a	\$0
				0.0		1/2	φυ Ι
Remediation/Disposal		400000000000000000000000000000000000000					\$237
Remediation/Disposal Permit Costs Other (as needed)	\$2,000	20-Aug-2005	1-Jan-2008	2.4 0.0	\$237 \$0	n/a n/a	\$237 \$0
Permit Costs	F-threshold on	ete to amond the ne	armit to change th	2.4 0.0 ne repres	\$237 \$0 entation. The recession of the second of the secon	n/a	\$0 orted beginning
Permit Costs Other (as needed) Notes for DELAYED costs	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres te the Re Issued	\$237 \$0 entation. The rec espondent is expe	n/a n/a quest date is the rep acted to have a perm	\$0 orted beginning ilt amendment
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres ite the Re issued	\$237 \$0 entation. The recession of the second of the secon	n/a n/a nuest date is the rep	\$0 orted beginning ilt amendment
Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres ite the Re Issued	\$237 \$0 entation. The recesspondent is expendent is expendent is expendent is expendent in the second secon	n/a n/a quest date is the rep ected to have a perm one-time avoided	\$0 orted beginning alt amendment costs)
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOICE GOSTS Disposal Personnel	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres ite the Re issued	\$237 \$0 entation. The recession of the second of the secon	n/a n/a n/a nuest date is the rep cted to have a perm cone-time avoided \$0 \$0 \$0 \$0	\$0 orted beginning hit amendment  costs) \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOICE GOSTS Disposal Personnel Inspection/Reporting/Sampling	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne represente the Resissued entering 0.0 0.0	\$237 \$0 entation. The recessor of the sexpondent is expendent is expendent is expendent is expendent in the sexpondent is expendent in the sexpondent in the sexpondent is expendent in the sexpondent in the sexp	n/a n/a n/a n/a nuest date is the repected to have a perm  one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 orted beginning ilt amendment  costs)  \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIGED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne represente the Resissued entering 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a quest date is the repected to have a perm cone-time avoided \$0	\$0 orted beginning nit amendment  costs)  \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres tte the Re Issued 0.0 0.0 0.0 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a n/a nuest date is the repected to have a perm  one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 orted beginning lit amendment  costs)  \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED GOSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres te the Re Issued entering 0.0 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a quest date is the repected to have a perm cone-time avoided \$0	\$0 orted beginning nit amendment costs) \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres tte the Re Issued 0.0 0.0 0.0 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a n/a nuest date is the repected to have a perm  one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 orted beginning lit amendment  costs)  \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres tte the Re Issued 0.0 0.0 0.0 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a n/a nuest date is the repected to have a perm  one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 orted beginning lit amendment \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED GOSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres tte the Re Issued 0.0 0.0 0.0 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a n/a nuest date is the repected to have a perm  one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 orted beginning lit amendment \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated co	sts to amend the period of the Fire period of the F	ermit to change the	2.4 0.0 ne repres tte the Re Issued 0.0 0.0 0.0 0.0 0.0 0.0	\$237 \$0 entation. The recessor of the recessor	n/a n/a n/a nuest date is the repected to have a perm  one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 orted beginning lit amendment \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

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Screening Date	· •	Docket	<b>No.</b> 2007-0493-AIR-E	PCW
[] 이 경우 경우 중인 경우 그는 이 경우에 가는 것이 되는 것이 없어 되었다.	Equistar Chemicals, LP		Police	y Revision 2 (September 2002)
Case ID No.				PCW Revision March 19, 2007
Reg. Ent. Reference No.				***************************************
Media [Statute]				***************************************
Enf. Coordinator Violation Number	,			
Rule Cite(s)		NODD 04077 00 0	O T	onal
raic oic(s)	1 01 0 02 170, 010 10.,	, NSRP 24677, SC 9., 30 4), and Tex. Health & Sa	0 Tex. Admin. Code §§ 116.115(c) ar afetv Code § 382.085(b)	10
Violation Description	conducted on January 29 and on six occasions fro	), 2007. Specifically, the	as documented during an investigation of the permit requires closed loop sampling the Respondent of th	g,
			Base Pena	ty \$10,000
>> Environmental, Property a Release OR Actual Potential	Harm Major Moderate	Minor	Percent 0%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor x	Percent 1%	
Matrix Notes The	Respondent failed to com	ply with 30% or less of t	he permit's Special Condition.	
			Adjustment \$9,9	00
			•	···········
				\$100
Violation Events				
·				
Number of Vio	lation Events 1	] 1	Number of violation days	***************************************
mark only one with an x	daily monthly quarterly semiannual annual single event x		Violation Base Penal	ty \$100
Bonnest control of the Control of th				
	One s	ingle event is recomme	nded.	
Economic Benefit (EB) for thi	s violation		Statutory Limit Test	
Estimated	I EB Amount	\$30	Violation Final Penalty Tot	al \$411
	5	•	-	
		inis violation Final A	ssessed Penalty (adjusted for limit	s) \$411

	Е	conomic B	Benefit W	orks	heet		
Respondent E	quistar Chem	icals, LP				1.00	
Case ID No. 3							
Reg. Ent. Reference No. F	RN100542281						
Media A Violation No. 5	\ir					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
Delayed Costs_							
Equipment				il 0,0 l	\$0	\$0	\$0
Buildings		100000000000000000000000000000000000000		0,0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0,0	<b>\$</b> 0	n/a	\$0
Training/Sampling				0.0	\$0 \$0	n/a n/a	\$0 \$0
Remediation/Disposal			A D 000F	0.0	\$0 \$30	n/a n/a	\$30
Permit Costs Other (as needed)	\$2,000	20-Aug-2005	6-Dec-2005	0.0	\$0	n/a	\$0
Notes for DELAYED costs .	date of the	violations and the	Final Date is the	date the method	permit was altered s.	Required is the report to allow for alterna	te sampling
Avoided Costs_	ANN	IUALIZE [1] avoide	d costs before e			one-time avoided o	osts)
Disposal				0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
inspection/Reporting/Sampling				0.0	\$0 \$0	\$0 \$0	\$0 \$0
Supplies/equipment				0.0	\$0 \$0	\$0 \$0	\$0
Financial Assurance [2]	-			0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3] Other (as needed)				0.0	\$0	\$0	\$0
Other (as needed)		المستسمال		11	, 30		
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$2,000			TOTAL		\$30

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	<b>Date</b> 18-Apr-2007		t <b>No.</b> 2007-0493-AIR-E	PCW
Branch (1988) And Control of the	ndent Equistar Chemicals, LF		Policy R	Revision 2 (September 2002)
	ID No. 33070		PC	W Revision March 19, 2007
Reg. Ent. Reference	A 15 (1 15 AND 15 A			
Media [St	atutej Air Inator Terry Murphy			
Elli, Coold	V12 6			
Rule	<u> </u>	1 A 30 Tey Admin Cod	de §§ 117.213(a) and 122.143(4), and	1
	0,000,000	Tex. Health & Safety Co.	de § 382.085(b)	
Violation Desc	rintion documented during a	n investigation conducted	of flow for Heater MSMHT2801B, as on January 29, 2007. Specifically, on hat the record of flow was not kept for periods.	
			Base Penalty	\$10,000
>> Environmental Par			- •	
22 Environmental, Prop	oerty and Human Health I Harm	Matrix		
R	d <b>elease</b> Major Modera	te Minor		
OR	Actual			
P	otential		Percent 0%	
>> D				
>>Programmatic Matrix		o Minor		
T disin	ication Major Modera	e Minor	Percent 1%	
		<u> </u>	170	
Matrix Notes	The Respondent for	ailed to comply with less the	han 30% of the rule.  Adjustment \$9,900	
			hom.	\$100
			L.	Ψ100
Violation Events				
Numbe	er of Violation Events 1	2	Number of violation days	***************************************
	TOTAL COMPANIES		rumber of violation days	***************************************
mark oi with			Violation Base Penalty[	\$100
	One	single event is recommer	nded.	,
Economic Benefit (EB) 1	for this violation	200	Statutory Limit Test	
F-4	imated EP Amarrat	6440]		
EST	imated EB Amount	\$110	Violation Final Penalty Total	\$411
		This violation Final A	ssessed Penalty (adjusted for limits)	\$411
			, –	

	E	conomic E	Benefit W	orks	heet		
Respondent	Equistar Chem	icals, LP				J Turns	
Case ID No.						. W. of W	
Reg. Ent. Reference No.					1		
Media						Percent Interest	Years of
Violation No.	£					, 0,00,10,11,11,11	Depreciation
Violation ito.	Ü					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
11.00		Date Required	i mar Bato				
Item Description	No commas or \$						į į
Delayed Costs		<del></del>		0.0	\$0	\$0	\$0
Equipment		-		0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$O <sub>2</sub>
Other (as needed)	\$1,000	8-Apr-2006	5-Nov-2007	1.6	\$5	\$105	\$110
Engineering/construction Land	\$1,000	0-Api-2000	O INOV EGG!	0.0	\$0	n/a	\$0
Record Keeping System				0,0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0,0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)	0.0200000000000000000000000000000000000			0.0	\$0	n/a	\$0
Notes for DELAYED costs  Avoided Costs	the rep	osts to improve the coorted violation, and	the Final Date is	the date	the Respondent o	completed the impro	costs)
Ayorded Gosts Disposal		1		0,0	\$0	\$0	\$U
Personnel				0,0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]				0,0	\$0	\$0	, \$0 \$0
ONE-TIME avoided costs [3]				0.0	\$0	\$0	ISSNESSES AND SERVICE POR PROSPECTOR
	DEPOSITION FOR DESCRIPTION OF	AND THE PROPERTY OF THE PARTY O					
Other (as needed)		ليستنسال		0.0	\$0	\$0	\$0
Other (as needed)  Notes for AVOIDED costs				<u>JI 0,0</u>	1 \$0	\$0	

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Screening Date		Docke	t <b>No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP		Policy Re	vision 2 (September 2002)
Case ID No.			PCM	V Revision March 19, 2007
Reg. Ent. Reference No.				***************************************
Media [Statute] Enf. Coordinator				***************************************
Em. Coordinator Violation Number	7			***************************************
Rule Cite(s)	<u> </u>	00 T	PPPPPPPPPVNVNVNEETPPNNPPNVNEET	***************************************
raio oia(s)		, 30 Tex. Admin. Code § Tex. Health & Safety Co	§ 111.111(a)(1)(B) and 122.143(4), and de § 382.085(b)	
Violation Description	during an investigation	conducted on January 2	Collector EPN28E29, as documented 9, 2007. Specifically, the Respondent % opacity for approximately ten minutes 2006.	
			Base Penalty	\$10,000
	1 1 1 1			***************************************
>> Environmental, Property a	ng Human Health IV Harm	iatrix		www
Release	Major Moderate	e Minor		
OR Actual		x		
Potential			Percent 25%	
>>Programmatic Matrix		1.0		
Falsification	Major Moderate	e Minor	Percent 0%	
			Percent 0%	
Total Control				
			significant amounts of pollutants not	
Notes exceeding le	evels protective of human	n health or environmenta	I receptors as a result of the violation.	
			Adjustment \$7,500	,
			r	\$2,500
			L	\$2,500
Violation Events				
				***************************************
Number of Vio	lation Events 1		Number of violation days	
	daily			
	monthly	##### ################################	Violation Boso Bonolfus	\$2,500
mark only one with an x	quarterly	8888 8888	Violation Base Penalty	Ψ2,300
	semiannual annual			
	single event x			
			·	
	One	single event is recomme	inded.	
Economic Benefit (EB) for thi	s violation		Statutory Limit Test	
Estimated	I EB Amount	\$73	Violation Final Penalty Total	\$10,275
		This violation Final	Assessed Penalty (adjusted for limits)	\$10,000

	33070					State of the second	
Reg, Ent. Reference No. Media Violation No.	Air					Percent Interest	Years of Depreciation
					VICTOR	5.0	. 3 1
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Delayed Gosts Equipment		ı ı		î <u>0.0 l</u>	\$0	\$0	\$0
Buildings				0,0	\$0	\$0	\$0
Other (as needed)				0,0	\$0	\$0	\$0
Engineering/construction		5000		0,0	\$0	\$0 13	\$0
Land				0,0	\$0	n/a	\$0
Record Keeping System				0,0	\$0	n/a	\$0
Training/Sampling	\$1,000	15-Aug-2006	1-Feb-2008	1.5	\$73	n/a	\$73
Remediation/Disposal				0.0	\$0	n/a	\$0 00
Permit Costs Other (as needed)				0.0	\$0 \$0	n/a n/a	\$0 \$0
	Estimated co	osts to provide addi	tional training and	or impro	oved oversight ov	er the dust collector.	The Required
Notes for DELAYED costs	Date is the	osts to provide addi date of the violation	n, and the Final D	ate is the	oved översight ov date Equistar is improvements.	er the dust collector, expected to have co	The Required mpleted the
	Date is the	date of the violation	n, and the Final D additional tra	ate is the lining or	e date Equistar is Improvements	expected to have co	ompleted the
Notes for DELAYED costs  AVOIDED COSTS  Disposal	Date is the	date of the violation	n, and the Final D additional tra	ate is the lining or ntering	e date Equistar is improvements. : Item (except for \$0	expected to have co	ompleted the costs) \$0
Avoided Costs	Date is the	date of the violation	n, and the Final D additional tra	ate is the ining or intering 0.0 0.0	e date Equistar is improvements. Item (except for \$0 \$0	expected to have co	costs) \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Date is the	date of the violation	n, and the Final D additional tra	ate is the hining or ntering 0.0 0.0 0.0 0.0	e date Equistar is improvements. Item (except for \$0 \$0	expected to have co	costs) \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Date is the	date of the violation	n, and the Final D additional tra	ntering   0.0   0.0   0.0   0.0   0.0	e date Equistar is improvements! Item (except for \$0 \$0 \$0	expected to have on the partial one-time avoided one-time	costs) \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Date is the	date of the violation	n, and the Final D additional tra	ntering   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0	e date Equistar is improvements	expected to have co	sompleted the source of the so
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Date is the	date of the violation	n, and the Final D additional tra	ntering   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0	e date Equistar is improvements. State of the control of the contr	expected to have co	sompleted the source of the so
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Date is the	date of the violation	n, and the Final D additional tra	ntering   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0	e date Equistar is improvements	expected to have co	sompleted the source of the so
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Date is the	date of the violation	n, and the Final D additional tra	ntering   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0	e date Equistar is improvements. State of the control of the contr	expected to have co	sompleted the source of the so
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Date is the	date of the violation	n, and the Final D additional tra	ntering   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0   0.0	e date Equistar is improvements. State of the control of the contr	expected to have co	sompleted the source of the so

## **Compliance History**

CN600124705 Customer/Respondent/Owner-Operator: Equistar Chemicals, LP Classification: AVERAGE Rating: 2.55 Site Rating: 2.25 Regulated Entity: RN100542281 CHANNELVIEW COMPLEX Classification: AVERAGE ID Number(s): AIR OPERATING PERMITS ACCOUNT NUMBER HG0033B AIR OPERATING PERMITS PERMIT 1426 AIR OPERATING PERMITS PERMIT 2174 AIR OPERATING PERMITS **PERMIT** 2175 AIR OPERATING PERMITS **PERMIT** 2176 AIR OPERATING PERMITS PERMIT 2177 AIR OPERATING PERMITS PERMIT 2178 PERMIT AIR OPERATING PERMITS 2179 AIR OPERATING PERMITS **PERMIT** 2180 PERMIT AIR OPERATING PERMITS 2181 PERMIT AIR OPERATING PERMITS 2182 AIR OPERATING PERMITS PERMIT 2183 AIR OPERATING PERMITS PERMIT 2184 AIR OPERATING PERMITS PERMIT 2185 WASTEWATER PERMIT WQ0000391000 TPDES0003531 PERMIT WASTEWATER WASTEWATER PERMIT TX0003531 AIR NEW SOURCE PERMITS PERMIT 1768 AIR NEW SOURCE PERMITS **PERMIT** 2128 AIR NEW SOURCE PERMITS PERMIT 2933 AIR NEW SOURCE PERMITS **PERMIT** 2935 AIR NEW SOURCE PERMITS PERMIT 2936 AIR NEW SOURCE PERMITS **PERMIT** 3130A AIR NEW SOURCE PERMITS **PERMIT** 3294 AIR NEW SOURCE PERMITS PERMIT 3627 AIR NEW SOURCE PERMITS **PERMIT** 6245 AIR NEW SOURCE PERMITS PERMIT 6387 PERMIT 8123 AIR NEW SOURCE PERMITS AIR NEW SOURCE PERMITS PERMIT 8125 AIR NEW SOURCE PERMITS PERMIT 10586 10700 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS **PERMIT** 10812 PERMIT 11735 AIR NEW SOURCE PERMITS AIR NEW SOURCE PERMITS **PERMIT** 12334 13849 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS **PERMIT** 15348 12341 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS **PERMIT** 22779 AIR NEW SOURCE PERMITS PERMIT 23079 AIR NEW SOURCE PERMITS PERMIT 24677 AIR NEW SOURCE PERMITS PERMIT 24887 30868 AIR NEW SOURCE PERMITS PERMIT 32324 AIR NEW SOURCE PERMITS **PERMIT** AIR NEW SOURCE PERMITS PERMIT 32136 32629 AIR NEW SOURCE PERMITS **PERMIT** 33899 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS PERMIT 34036 34897 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS **PERMIT** 38750 42948 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS PERMIT 43770 45332 AIR NEW SOURCE PERMITS PERMIT AIR NEW SOURCE PERMITS **PERMIT** 46417 AIR NEW SOURCE PERMITS PERMIT 47326 AIR NEW SOURCE PERMITS **PERMIT** 47487 AIR NEW SOURCE PERMITS **PERMIT** 50141 50142 AIR NEW SOURCE PERMITS PERMIT 50165 AIR NEW SOURCE PERMITS **PERMIT** 50322 AIR NEW SOURCE PERMITS PERMIT ACCOUNT NUMBER HG0033B AIR NEW SOURCE PERMITS 50812 AIR NEW SOURCE PERMITS **PERMIT** AIR NEW SOURCE PERMITS PERMIT 52720 AIR NEW SOURCE PERMITS 52726 PERMIT AIR NEW SOURCE PERMITS PERMIT 54098 REGISTRATION 54602 AIR NEW SOURCE PERMITS AIR NEW SOURCE PERMITS PERMIT 54801 AIR NEW SOURCE PERMITS PERMIT 55104

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AFS NUM

55669

4820100075

AIR NEW SOURCE PERMITS		REGISTRATION	56137
AIR NEW SOURCE PERMITS		PERMIT	PSDTX991
AIR NEW SOURCE PERMITS		PERMIT	70201
		REGISTRATION	70323
AIR NEW SOURCE PERMITS			
AIR NEW SOURCE PERMITS		PERMIT	49120
AIR NEW SOURCE PERMITS		PERMIT	49130
AIR NEW SOURCE PERMITS		REGISTRATION	76017
AIR NEW SOURCE PERMITS	1. A.D. 45. Dr.	REGISTRATION	75881
AIR NEW SOURCE PERMITS		REGISTRATION	76313
AIR NEW SOURCE PERMITS		REGISTRATION	76277
AIR NEW SOURCE PERMITS		PERMIT	71143
			70203
AIR NEW SOURCE PERMITS		PERMIT	
AIR NEW SOURCE PERMITS		PERMIT	54063
AIR NEW SOURCE PERMITS		PERMIT	51727
AIR NEW SOURCE PERMITS		PERMIT	55680
AIR NEW SOURCE PERMITS		REGISTRATION	72713
AIR NEW SOURCE PERMITS		PERMIT	72755
AIR NEW SOURCE PERMITS	1.1	REGISTRATION	72948
AIR NEW SOURCE PERMITS		REGISTRATION	72946
		REGISTRATION	73859
AIR NEW SOURCE PERMITS	•		
AIR NEW SOURCE PERMITS		REGISTRATION	74051
AIR NEW SOURCE PERMITS		REGISTRATION	74110
AIR NEW SOURCE PERMITS		REGISTRATION	74162
AIR NEW SOURCE PERMITS		REGISTRATION	74181
AIR NEW SOURCE PERMITS		REGISTRATION	74366
AIR NEW SOURCE PERMITS		REGISTRATION	74374
AIR NEW SOURCE PERMITS		PERMIT	74385
AIR NEW SOURCE PERMITS		REGISTRATION	74416
AIR NEW SOURCE PERMITS		REGISTRATION	74563
AIR NEW SOURCE PERMITS		REGISTRATION	74944
AIR NEW SOURCE PERMITS		REGISTRATION	74949
AIR NEW SOURCE PERMITS		REGISTRATION	75322
AIR NEW SOURCE PERMITS	\$	EPA ID	PSDTX993
AIR NEW SOURCE PERMITS	. "	REGISTRATION	76651
AIR NEW SOURCE PERMITS		REGISTRATION	76666
		REGISTRATION	76693
AIR NEW SOURCE PERMITS			
AIR NEW SOURCE PERMITS		REGISTRATION	76778
AIR NEW SOURCE PERMITS		REGISTRATION	76791
AIR NEW SOURCE PERMITS	- 1	REGISTRATION	77318
AIR NEW SOURCE PERMITS		REGISTRATION	77619
AIR NEW SOURCE PERMITS		REGISTRATION	77640
AIR NEW SOURCE PERMITS		REGISTRATION	77631
AIR NEW SOURCE PERMITS		REGISTRATION	78024
AIR NEW SOURCE PERMITS		REGISTRATION	78069
			78108
AIR NEW SOURCE PERMITS		REGISTRATION	
AIR NEW SOURCE PERMITS		REGISTRATION	78114
AIR NEW SOURCE PERMITS		REGISTRATION	78128
AIR NEW SOURCE PERMITS		REGISTRATION	78173
AIR NEW SOURCE PERMITS		REGISTRATION	78191
AIR NEW SOURCE PERMITS		REGISTRATION	78197
AIR NEW SOURCE PERMITS		REGISTRATION	78252
AIR NEW SOURCE PERMITS		REGISTRATION	78278
	. * *	REGISTRATION	78343
AIR NEW SOURCE PERMITS			78381
AIR NEW SOURCE PERMITS		REGISTRATION	
AIR NEW SOURCE PERMITS		REGISTRATION	78560
AIR NEW SOURCE PERMITS		REGISTRATION	78772
AIR NEW SOURCE PERMITS		REGISTRATION	78819
AIR NEW SOURCE PERMITS		REGISTRATION	78978
AIR NEW SOURCE PERMITS		REGISTRATION	78599
AIR NEW SOURCE PERMITS		PERMIT	72756
AIR NEW SOURCE PERMITS		REGISTRATION	79261
		REGISTRATION	79431
AIR NEW SOURCE PERMITS		REGISTRATION	79460
AIR NEW SOURCE PERMITS			
AIR NEW SOURCE PERMITS		REGISTRATION	79647
AIR NEW SOURCE PERMITS			79712
AIR NEW SOURCE PERMITS		REGISTRATION	79892
AIR NEW SOURCE PERMITS	1.00	REGISTRATION	79938
AIR NEW SOURCE PERMITS	1.54	REGISTRATION	80296
AIR NEW SOURCE PERMITS		REGISTRATION	80137
AIR NEW SOURCE PERMITS		REGISTRATION	80449
AIR NEW SOURCE PERMITS			80597
			80689
AIR NEW SOURCE PERMITS		REGISTRATION	
AIR NEW SOURCE PERMITS		REGISTRATION	80914
AIR NEW SOURCE PERMITS		REGISTRATION	81190
AIR NEW SOURCE PERMITS		REGISTRATION	81189
AIR NEW SOURCE PERMITS	# F 19	REGISTRATION	81543

INDUSTRIAL AND HAZARDOUS WASTE

GENERATION

INDUSTRIAL AND HAZARDOUS WASTE

GENERATION

INDUSTRIAL AND HAZARDOUS WASTE

STORAGE

INDUSTRIAL AND HAZARDOUS WASTE

STORAGE

UNDERGROUND INJECTION CONTROL PUBLIC WATER SYSTEM/SUPPLY

WATER LICENSING IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION #

(SWR)

30030 50117

WDW036

TXD058275769

PERMIT

50117

REGISTRATION 1011578 LICENSE 1011578 SOLID WASTE REGISTRATION # 30030

(SWR)

EPA ID

PERMIT

PERMIT

Location:

8280 SHELDON RD BLDG 1, CHANNELVIEW, TX, 77530

Rating Date: September 01 06 Repeat Violator: NO

TCEQ Region:

**REGION 12 - HOUSTON** 

Date Compliance History Prepared:

May 01, 2007

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

May 2, 2002 to May 2, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Terry Murphy

Phone:

(512) 239-5025

## Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period?

2. Has there been a (known) change in ownership of the site during the compliance period? 3. If Yes, who is the current owner?

Yes Nο N/A

4. if Yes, who was/were the prior owner(s)?

N/A

5. When did the change(s) in ownership occur?

N/A

## Components (Multimedia) for the Site:

A. Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 11/02/2002

ADMINORDER 2001-1516-AIR-E (1660)

Classification: Moderate

Citation:

40 CFR Part 61, Subpart FF 61.342(c)(1)(ii) 40 CFR Part 61, Subpart FF 61.343(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to prevent unauthorized emissions as a result of a spill from a permitted tank. Effective Date: 04/13/2003 ADMINORDER 1999-1410-AIR-E (1660)

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.112(a)(1) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to have the required vapor recovery system or submerged fill pipe at the time of inspection on

Tank No. 6901 in VOC service.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter C 115.216(4)(B)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to keep copies of each marine vessel's certification of annual vapor tightness tests for marine

loading operations at the Plant. Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter D 115.356(1)(F)

30 TAC Chapter 115, SubChapter D 115.356(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to maintain calibration records for VOC monitoring instruments for two years. Calibration records from the first, second and fourth quarters of 1997 and the first quarter of 1998 were unavailable.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT W 61.275(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit results of seal inspections for Tanks 3111A, 3111B, 3113 and 4916 w/i 60 days after

Equistar completed the seal inspections on April 21 thru April 27, 1998.

Classification: Moderate

30 TAC Chapter 101, SubChapter A 101.20(1)

40 CFR Part 60, Subpart Kb 60.115b(b)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a seal inspection report for Tank No. 4922 and Tank No. 33 within 60 days of

inspection.

Classification: Moderate

30 TAC Chapter 115, SubChapter D 115.354(2)[G]

30 TAC Chapter 115, SubChapter D 115.355(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-2(a)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(f)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245(b)

40 CFR Part 60, Subpart VV 60.482-2[G]

40 CFR Part 60, Subpart VV 60.482-7[G]

40 CFR Part 61, Subpart V 61.242-7(a)

40 CFR Part 61, Subpart V 61.245(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly monitor fugitive emissions for several units, including the Olefins Plant I and Tank Farm, Olefins Plant II and Tank Farm, Butadiene Plants E and W, Barge Dock, Benzene/Toluene Unit, East Tank

Farm, LMTBE Unit and the MeOH Unit.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.114(a)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to perform seal gap measurements on Tanks TK-26, TK-3115, TK-3112, and TK-4921 on an

annual basis in 1998. Classification: Moderate

Citation:

5C THC Chapter 382, SubChapter A 382.0518[G]

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification as requird by Standard Exemption 106 (effective August 25, 1986) when

the 1200 Unit was modified to produce a new product.

Effective Date: 12/02/2006

ADMINORDER 2006-0515-AIR-E (findings)

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: S.C. 1 PERMIT

Description: Failure to prevent the release of unauthorized emissions from an aboveground storage tank pressure

safety valve.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1	04/22/2002	(156273)	111	08/31/2003	(134179)	223	04/06/2005	(375076)
2	05/22/2002	(1339)	112	08/31/2003	(134175)	224	04/18/2005	(375016)
_			113	10/01/2003	(249301)	225	04/20/2005	(376147)
3	05/22/2002	(1314)	114	10/01/2003	(249144)	226	04/20/2005	(372583)
4	05/23/2002	(156277)	115	10/01/2003	(249012)	227	04/22/2005	(346277)
5	06/05/2002	(2105)	116	10/01/2003	(249172)	228	04/25/2005	(377509)
6	06/10/2002	(2233)	117	10/01/2003	(248879)	229	05/03/2005	(419501)
7	06/12/2002	(1611)	118	10/01/2003	(248981)	230	05/24/2005	(419502)
8	06/24/2002	(2701)	119	10/01/2003	(248243)	231	06/14/2005	(393497)
9	06/24/2002	(156281)	120	10/03/2003	(249082)	232	06/21/2005	(419503)
10	06/24/2002	(2914)	121	10/07/2003	(250145)	233	06/22/2005	(381407)
11	07/19/2002	(5534)	122	10/17/2003	(294653)	234	06/22/2005	(392621)
12	07/19/2002	(5345)	123	10/23/2003	(294655)	235	06/23/2005	(378466)
13	07/19/2002	(4814)	124	11/05/2003	(254238)	236	06/23/2005	(378454)
14	07/19/2002	(4569)	125	11/18/2003	(294656)	237	07/15/2005	(395098)
15	07/23/2002	(156285)	126	12/29/2003	(294657)	238	07/18/2005	(392902)
16	07/31/2002	(5089)	127	01/23/2004	(294658)	239	07/22/2005	(392487)
17	08/01/2002	(4981)	128	02/24/2004	(294639)	240	07/22/2005	(381313)
18	08/02/2002	(6606)	129	03/15/2004	(255945)	241	07/22/2005	(392651)
19	08/06/2002	(7028)	130	03/22/2004	(294642)	242	07/22/2005	(394428)
20	08/06/2002	(7144)	131	03/23/2004	(263250)	243	07/25/2005	(440656)
21	08/06/2002	(7204)	132	03/23/2004	(263160)	244	07/26/2005	(399215)
22	08/06/2002	(7234)	133	03/23/2004	(263194)	245	08/05/2005	(381400)
23	08/07/2002	(7141)	134	03/23/2004	(263154)	246	08/05/2005	(392610)
24	08/08/2002	(2391)	135	03/24/2004	(256278)	247	08/05/2005	(393207)
25	08/09/2002	(2626)	136	04/14/2004	(264758)	248	08/11/2005	(404370)
26	08/09/2002	(7549)	137	04/15/2004	(453160)	249	08/11/2005	(404367)
27	08/09/2002	(4157)	138	04/23/2004	(294643)	250	08/11/2005	(404342)
28	08/09/2002	(5980)	139	05/19/2004	(270464)	251	08/11/2005	(404321)
29	08/09/2002	(2387)	140	05/24/2004	(294645)	252	08/12/2005	(399221)
30	08/12/2002	(6957)	141	06/08/2004	(270126)	253	08/15/2005	(404957)
31	08/13/2002	(7700)	142	06/21/2004	(294647)	254	08/23/2005	(440657) 4

32	08/16/2002	(5841)	143	06/30/2004	(273943)	255	08/24/2005	(406415)
33	08/19/2002	(8124)	144	06/30/2004	(271411)	256	08/26/2005	(372787)
		, .			, ,			
34	08/21/2002	(156288)	145	06/30/2004	(274359)	257	08/29/2005	(406161)
35	08/22/2002	(5939)	146	06/30/2004	(274423)	258	09/13/2005	(431694)
36	08/22/2002	(5772)	147	07/09/2004	(278834)	259	10/24/2005	
		• •			•			(440658)
37	08/27/2002	(7197)	148	07/13/2004	(260492)	260	10/26/2005	(440659)
38	08/28/2002	(8742)	149	07/19/2004	(260586)	261	11/15/2005	(434603)
		, ,			•			
39	08/30/2002	(10526)	150	07/25/2004	(351828)	262	11/18/2005	(437299)
40	08/30/2002	(10522)	151	07/29/2004	(263469)	263	11/22/2005	(468155)
41	09/04/2002	(8299)	152	08/04/2004	(280108)	264	11/28/2005	(468154)
42	09/10/2002	(10385)	153	08/04/2004	(280174)	265	12/01/2005	(435325)
43	09/18/2002	(11434)	154	08/11/2004	(284585)	266	12/08/2005	(434728)
44	09/23/2002	(156291)	155	08/13/2004				
		•			(277268)	267	12/19/2005	(438915)
45	10/21/2002	(156294)	156	08/23/2004	(259476)	268	12/21/2005	(468156)
46	11/25/2002	(156298)	157	08/24/2004	(351829)	269	02/15/2006	(455481)
		· ·						-
47	11/27/2002	(14344)	158	08/27/2004	(265746)	270	02/22/2006	(450109)
48	12/19/2002	(156302)	159	08/27/2004	(269133)	271	02/24/2006	(451477)
49	12/27/2002	(15704)	160	08/27/2004	(265803)	272	02/27/2006	(468153)
		, ,			, ,			
50	12/30/2002	(17670)	161	08/27/2004	(266244)	273	02/28/2006	(451452)
51	01/02/2003	(18051)	162	08/29/2004	(268291)	274	02/28/2006	(451480)
52	01/09/2003	' '		08/31/2004	, ,			. ,
52		(16679)	163		(276264)	275	02/28/2006	(451788)
53	01/21/2003	(156306)	164	08/31/2004	(271963)	276	02/28/2006	(451483)
54	01/30/2003	(23340)	165	08/31/2004	(272796)	277	02/28/2006	(451494)
					•			
55	02/05/2003	(23369)	166	08/31/2004	(274451)	278	03/13/2006	(454890)
56	02/24/2003	(4858)	167	09/01/2004	(286398)	279	03/23/2006	(498017)
57	02/24/2003	` '		09/01/2004	` '			
		(156266)	168		(289083)	280	03/24/2006	(457373)
58	02/26/2003	(20471)	169	09/01/2004	(289240)	281	03/28/2006	(453139)
59	03/07/2003	(20710)	170	09/10/2004	(273388)	282	03/29/2006	(459500)
		, ,						` '
60	03/07/2003	(9862)	171	09/16/2004	(263553)	283	03/31/2006	(455940)
61	03/18/2003	(20944)	172	09/23/2004	(351830)	284	04/24/2006	(498018)
62	03/24/2003	, ,	173	10/25/2004				,
		(156269)			(351831)	285	04/28/2006	(462755)
63	04/11/2003	(24878)	174	10/25/2004	(351833)	286	05/16/2006	(463873)
64	04/11/2003	(24871)	175	11/01/2004	(285942)	287	05/23/2006	(498019)
		•						
65	04/11/2003	(24868)	176	11/03/2004	(334297)	288	05/23/2006	(466508)
66	04/13/2003	(31335)	177	11/05/2004	(334314)	289	05/24/2006	(465260)
67	04/22/2003	(156274)	178	11/05/2004		290		
		•			(334310)		05/31/2006	(480441)
68	04/23/2003	(33871)	179	11/05/2004	(334308)	291	05/31/2006	(480422)
69	04/25/2003	(33319)	180	11/11/2004	(292333)	292	05/31/2006	(480433)
					, ,			
70	04/25/2003	(28077)	181	11/11/2004	(292452)	293	05/31/2006	(480405)
71	05/07/2003	(27054)	182	11/14/2004	(275792)	294	05/31/2006	(480427)
72	05/08/2003	, ,	183	11/22/2004				
		(35681)			(293289)	295	05/31/2006	(480444)
73	05/15/2003	(282930)	184	11/22/2004	(339105)	296	06/21/2006	(498020)
74	05/19/2003	(36187)	185	11/22/2004	(339107)	297	06/26/2006	(464019)
		, ,			,			. ,
75	05/23/2003	(156278)	186	11/23/2004	(334387)	298	06/30/2006	(483427)
76	06/13/2003	(38138)	187	11/23/2004	(351832)	299	07/07/2006	(484895)
77	06/18/2003				, ,			. ,
		(38117)		11/23/2004	(334429)		07/17/2006	(464664)
78	06/24/2003	(156282)	189	11/29/2004	(274800)	301	07/17/2006	(460500)
79	06/27/2003	(114332)	190	12/06/2004	(275639)	302	07/19/2006	(480415)
80								
	07/08/2003	(114317)		12/06/2004	(341908)		07/20/2006	(486401)
81	07/08/2003	(114279)	192	12/09/2004	(343543)	304	07/24/2006	(520033)
82	07/08/2003	(114581)	193	12/14/2004	(339112)	305	07/28/2006	(484749)
	07/08/2003	(114388)		12/15/2004	(339111)		08/04/2006	(339110)
84	07/11/2003	(38147)	195	12/27/2004	(381708)	307	08/15/2006	(482128)
85	07/11/2003	(112449)	196	12/27/2004	(276826)	308	08/15/2006	(481194)
					` '			
86	07/23/2003	(294649)		12/28/2004	(343601)	309	08/15/2006	(489890)
87	08/04/2003	(64101)	198	01/03/2005	(286756)	310	08/16/2006	(457265)
88	08/06/2003	(147467)		01/03/2005	(339113)	311	08/21/2006	(520034)
89	08/06/2003	(147338)	200	01/04/2005	(339104)	312	09/01/2006	(510768)
90	08/12/2003	(148968)	201	01/05/2005	(339108)	313	09/05/2006	(486742)
91	08/12/2003							
		(148934)		01/07/2005	(339103)		09/25/2006	(520035)
92	08/12/2003	(112317)	203	01/10/2005	(343232)	315	10/04/2006	(488324)
93	08/12/2003	(148923)	204	01/12/2005	(346553)	316	10/24/2006	(544282)
94	08/14/2003	(149856)		01/18/2005	(336265)		11/21/2006	(516667)
95	08/14/2003	(149867)	206	02/10/2005	(349636)	318	11/27/2006	(544283)
96	08/14/2003	(141032)		02/10/2005	(349316)		11/30/2006	(531615)
97	08/14/2003	(149824)	208	02/10/2005	(349111)	320	12/11/2006	(519152)
98	08/19/2003	(149893)	209	02/10/2005	(337111)	321	12/19/2006	(544284)
50	55,15/2000	(. 10000)	_00		(	JZ 1	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	(311207)
99	08/19/2003	(149887)	210	02/10/2005	(349267)	322	12/29/2006	(535494)
100	08/19/2003	(149908)	211	02/11/2005	(336418)		01/23/2007	(544285)
101	08/22/2003	(149977)	212	02/11/2005	(336433)	324	01/30/2007	(538091)
102	08/25/2003	(149897)	213	02/11/2005	(336438)	325	01/31/2007	(537102)
	/	, · /		• •	\- · - · - /			5

103	08/25/2003	(294651)	214	02/17/2005	(343594)	326	01/31/2007	(517108)
104	08/25/2003	(151586)	215	02/23/2005	(381706)	327	01/31/2007	(537091)
105	08/25/2003	(151756)	216	02/25/2005	(345588)	328	01/31/2007	(537099)
106	08/25/2003	(151765)	217	03/03/2005	(339106)	329	02/08/2007	(538420)
107	08/27/2003	(152697)	218	03/22/2005	(381707)	330	02/22/2007	(485046)
108	08/27/2003	(13764)	219	03/28/2005	(375234)	•331	02/27/2007	(532597)
109	08/29/2003	(152195)	220	03/28/2005	(375220)	332	03/21/2007	(532595)
110	08/29/2003	(152183)	221	03/28/2005	(375212)	333	04/05/2007	(532607)
		, ,	222	03/31/2005	(373125)	334	04/10/2007	(532608)
						335	04/12/2007	(541831)
						336	04/12/2007	(554839)
						337	04/23/2007	(539454)

## Written notices of violations (NOV). (CCEDS Inv. Track. No.) E.

Date: 06/30/2002 (156285)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 07/31/2002 (156288)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter

Description: (156294)

Date: 09/30/2002 Classification: Moderate Self Report? YES

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description: Date: 10/31/2002 (156298)

Self Report?

Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

(15704)Date: 01/27/2003

Classification: Moderate Self Report? NO

30 TAC Chapter 101, SubChapter F 101.222(b)(2) Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)[G]

Description: Failure to control emissions.

Date: 01/31/2003 (156266)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 02/10/2003 (24871)

Classification: Moderate Self Report?

30 TAC Chapter 101, SubChapter F 101.222(b)(2) Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(1) Description: Failure to prevent unauthorized emissions.

Date: 02/28/2003 (156269)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26 121(a)[G]

Fallure to meet the limit for one or more permit parameter Description:

03/07/2003 (9862) Date:

Self Report? 30 TAC Chapter 101, SubChapter A 101.7(b)(1)(G) Citation:

30 TAC Chapter 101, SubChapter A 101.7(c)(7) Failure to document the actions taken to minimize emissions in both the initial and final Description:

Classification:

Minor

notification records for a start-up event on 02/16/2002.

(156274) Date: 03/31/2003

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 04/11/2003 (24868)

Moderate Classification: Self Report?

30 TAC Chapter 101, SubChapter F 101.222(b)(3) Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(1)

Failure to prevent unauthorized emissions. Description: Date: 04/30/2003 (156278)

Self Report? YES Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305,125(1) TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 05/31/2003 (156282)

Self Report? Classification: YES Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 07/31/2003 (294651)

Self Report? Classification:

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 08/31/2003

Self Report? Classification: Moderate

Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 09/30/2003 (294655)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 10/01/2003 (248879)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Description: Failure to comply with the MAERT limit for EPN: 44E10.

Date: 10/01/2003 (248243)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation:

Description: Failure to comply with the MAERT limit.

10/01/2003 (249082)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.116(a)(1) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to torque the flange properly.

Date: 10/01/2003 (249144)

Classification: Self Report? Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Description: Failure to comply with the MAERT limit for EPN 17E01

10/01/2003 (249301)Date:

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(G)

Failure to comply with permit limit for VOC, CO and NO (EPN: 48E01). Description:

Date: 10/01/2003 (249012)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116,115(b)(2)(G) Failure to comply with the MAERT limit for EPN 6E07. Description:

Date: . 10/01/2003 (249172)

Self Report? Classification: Moderate

30 TAC Chapter 101, SubChapter F 101.201(a)(1)[G] Citation: Failure to submit the initial report within 24 hours. Description:

Date: 10/01/2003 (248981)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.116(a)(1) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Failure to comply with the state rule 30 TAC 116.116(a)(1) which resulted in unauthorized emissions. Description: Date: 02/29/2004 (294642)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 07/13/2004 (260492)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382,085(b) PERMIT TCEQ AIR PERMIT #1768, SC #1 Ramt Prov:

Exceeded VOC emissions limits during an avoidable emissions event.

Description:

Date: 07/19/2004 (260586)

Classification: Minor Self Report?

Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Failed to identify the facility name in an emissions event notification. Description:

Classification: Minor Self Report? NO

30 TAC Chapter 101, SubChapter F 101.201(g) Citation:

Equistar failed to submit an electronic final emissions event notification. Description:

Date: 07/28/2004

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Exceeded permit limits during an avoidable emissions event. Date: 08/11/2004 (263553)

Classification: Moderate Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G) Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(7) 5C THC Chapter 382, SubChapter A 382.085(b)

Failed to speciate VOC in the Initial Notification and Final Report submitted for an Description:

avoidable emissions event.

Date: 08/27/2004 (265746)

Classification: Minor Self Report?

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D)

30 TAC Chapter 101, SubChapter F 101,201(b)(4) Equistar failed to properly complete and submit an emissions event notification. Description:

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116,115(b) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Equistar exceeded permit limits during an avoidable emissions event. Description:

Date: 08/29/2004 (268291)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Equistar exceeded VOC permit limit. Description: Date: 08/31/2004 (272796)

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H) Citation: 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Failed to submit adminstratively complete emissions event notifications. Description:

08/31/2004 (271963)Date:

Classification: Moderate Self Report?

30 TAC Chapter 101, SubChapter F 101.211(a)(1)(F) Citation: 30 TAC Chapter 101, SubChapter F 101.211(b)(5)

30 TAC Chapter 116, SubChapter B 116.115(c) Equistar was not in compliance with the maintenance, startup, and shutdown rules. Description:

Date: 10/31/2004 (351832)

Rgmt Prov:

Citation:

Classification: Moderate Self Report? 30 TAC Chapter 305, SubChapter F 305.125(1)

Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 12/27/2004 (276826)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b) Citation:

5C THC Chapter 382, SubChapter A 382,085(b)

PERMIT TCEQ Air Permit No. 2933, GC #8 Rqmt Prov:

Exceeded permit limits during an avoidable emissions event. Description:

Date: 01/03/2005 (286756)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

**PERMIT 22779** 

Equistar failed to prevent an avoidable emissions event. Description:

Date: 01/04/2005 (339104)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)

5C THC Chapter 382, SubChapter A 382,085(b)

Equistar failed to prevent an avoidable emissions event.

Description:

01/10/2005 (343232)Date:

Classification: Minor Self Report?

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii) Citation: Failure to provide an adequate ground storage capacity. Description:

Classification: Minor Self Report? NO

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v) Citation:

Failure to provide a minimum pressure tank capacity of 220 gallons. Description:

Date: 04/20/2005 (372583)

Self Report? Classification: Minor

30 TAC Chapter 101, SubChapter F 101.201(g) Citation:

Description: Equistar failed to submit the Final Report electronically.

Self Report? Classification: Moderate

Citation: Ramt Prov:

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT Permit No. 22779, Special Condition No.1 Equistar failed to prevent an avoidable emissions event.

30 TAC Chapter 116, SubChapter B 116,115(c)

Description: Date: 08/05/2005 (381400)

Self Report? Classification: Minor

Citation:

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on furnace

Date: 08/05/2005 (393207)

Self Report? Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Failure to test within 60 days following installation of NOx control equipment on Furnace Description:

4406

Self Report? NO Classification:

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description: Failure to test within 60 days following installation of NOx control equipment on F4410.

Self Report? NO Classification: Minor

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II) Citation:

Failure to test within 60 days following installation of NOx control equipment on Furnace Description:

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Failure to test within 60 days following installation of NOx control equipment on Furnace Description:

3401 Date: 08/05/2005 (392610)

Self Report? Classification: Minor

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II) Citation:

Description: Failure to test within 60 days following installation of NOx control equipment on Furnace

4404

Date: 08/10/2005 (404514)Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: PERMIT TCEQ Permit #2128, GC #8

Description: Failure to prevent a leak in Tower T-301.

Date: 09/13/2005 (431694)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii) Description: Failure to provide an adequate ground storage capacity

NO Self Report? Classification: Minor

Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)

Description: Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 11/18/2005 (437299)

Self Report? Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT 3130A, SC No. 4

OP 002179, ST&C No. 10

Description: Failure to operate within pumping rates of Polyols(KOH) and (IMPACT).

Self Report? NO Classification: Minor

30 TAC Chapter 117, SubChapter B 117.213(a)[G] Citation:

Description: Failure to install the totalizing fuel flow meter on EGBVC6904.

12/08/2005 (434728) Date:

Self Report? Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter C 122.222(k)(3)

Failure to submit the off-permit notification for claiming the permit by rule for flare Description:

emissions.

NO Self Report? Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)

Description: Failure to register the PBR within 10 of increase in flare emissions.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)

> 30 TAC Chapter 115, SubChapter D 115,352[G] 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)

Rqmt Prov:

PERMIT 49130, S.C. No.5 OP O-02180, S.C No.1A

Description:

Failure to follow the fugitive monitoring for 172 valves and 5 pumps in the Isopropanol

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Minor

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

NO

Self Report?

30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov:

Citation:

Citation:

Citation:

OP O-02180, SC. 1.A

Description:

Failure to have required information on tags attached to visual fugitive leaks

Self Report? NO

30 TAC Chapter 101, SubChapter A 101.20(2)

30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Rqmt Prov:

PERMIT 49130, SC 5.E OP O-02180, SC 1.A

Description: NO Self Report?

Failure to cap or plug the five open-ended lines in VOC service

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov:

PERMIT 49130, S.C 7 OP O-02180, S.C 11

Description:

Failure to follow the procedure described in Appendix P, Section 5.5.1 for monitoring the

cooling tower (CT-2401) as required by the permit condition

Self Report?

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Citation: Description:

Failure to report the deviations regarding the cooling tower monitoring in the deviation

reports

Date: 12/19/2005 (438915)

Self Report?

Citation:

Citation:

30 TAC Chapter 122, SubChapter C 122.210(a)

Failure to submit the federal operating permit (0-02177) minor revision application Description: concurrent with the permit amendment issued on July 26, 2005 and permit by rules

claimed in 1997 and 2002. NO

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov:

PERMIT 22779, SC 1

OP O-02177, STC 10 Description:

Failure to operate tanks and loading arms within maximum allowable emission rates as

permitted in the NSR permit 22779.

NO Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov:

Citation:

PERMIT 22779, SC 8

OP O-02177, STC 10

Failure to initiate the fugitive monitoring for 22 valves and 3 pumps in the Polybutadiene Description:

Self Report? NO

Classification: 30 TAC Chapter 116, SubChapter B 116.115(c)

Citation: Rqmt Prov:

30 TAC Chapter 122, SubChapter B 122.143(4)

PERMIT 22779, SC 8.E

OP O-02177, STC 10

Failure to cap or plug the five open-ended lines in VOC service Description:

12/31/2005 (440659)Date:

Self Report?

Classification:

Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description: (450109)

Date: 02/22/2006

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 122, SubChapter B 122.143(4)

Ramt Prov:

**PERMIT 24887 SC1.E** 

OP 002176, SC 15

NO

Description:

Failure to cap or plug the eighty five (85) open-ended lines in VOC service Classification: Minor

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(4) 30 TAC Chapter 122, SubChapter C 122.222(k)(3)

Description:

Failure to register the PBRs 106.261 and 106.262 within 10 days of addition of a flare

analyzer and failure to make off-permit notification concurrently.

Self Report? NO Classification:

Moderate

Citation: Description:

Self Report?

30 TAC Chapter 122, SubChapter B 122.142(b)(2)(B)[G] Failure to represent the several sources that are subject to 30 TAC 111 rules in the Title

V Operating Permit.

Moderate Classification:

Citation:

30 TAC Chapter 116, SubChapter B 116,115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rgmt Prov:

PERMIT 24887 SC 1 OP 002176, SC 15

Description:

Failure to include 19 valves and 39 connectors associated with sample systems and

failure to include 5 pumps, 38 valves, 104 connectors, and 4 sample points in the fugitive

monitoring database.

Self Report? Citation:

30 TAC Chapter 115, SubChapter B 115.142[G]

Ramt Prov:

30 TAC Chapter 122, SubChapter B 122.143(4) OP 002176, SC 5

Description:

Failure to control the wastewater streams as required by 30 TAC 115.142.

Self Report?

NO

NΩ

30 TAC Chapter 122, SubChapter B 122.143(4)

Classification: Minor

Minor

Minor

Minor

Moderate

Classification:

Classification:

Classification:

Citation: Ramt Prov:

40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60,113b(b)(5)

Description:

OP 002176, SC 1.A

Date: 02/28/2006

Failure to make the tank seal inspection notification 30 days in advance. (451788)

Self Report? Citation:

30 TAC Chapter 115, SubChapter D 115.352(4)

30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

Rqmt Prov: Description: PA NSR Permit No. 8125, SC 6E

Self Report?

Failure to plug two open-ended-lines.

NO Citation:

30 TAC Chapter 117, SubChapter B 117.213(a)

Description:

Failure to install fuel flow meter on Diesel Engine, P-3314.

Self Report?

Classification:

NO

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)

Description:

Citation:

Failure to include compressor information in the HON Subpart H Semiannual report.

Self Report?

NO

Classification:

Classification:

Classification:

Classification:

Minor

Minor

Minor

Minor

Minor

Minor

Citation:

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(a)

Description:

Failure to maintain appropriate records of 220 connectors, 6 instrument systems, 4

PSVs, 2 pumps, and 101 valves. (457373)

Date: 03/24/2006

Self Report?

Classification: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)

Citation: Description:

Failure to provide an adequate ground storage capacity

Self Report?

Classification:

Citation:

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v) Failure to provide a minimum pressure tank capacity of 220 gallons.

Description: 03/28/2006 Date: (453139)

Self Report?

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

PA NSR Permit No 2936, SC 10E OP O-02182 Special Terms and Condition 15

Failed to plug 20 open-ended lines.

Description:

Self Report? NO

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(4)

30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter C 122.222(k)(2) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

OP O-02181 General Terms and Condition

Description:

The facility failed to register two tanks and one cooling tower within ten (10) days of

Self Report?

change as required during August 19, 2004 through November 22, 2004. Classification: Minor

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov: Description:

Citation:

OP O-02182 General Terms and Condition

Failure to include compressor information in the HON Subpart H semiannual report for

the reporting period from February 28, 2005 through August 19, 2005.

Self Report? NO

30 TAC Chapter 115, SubChapter D 115.354(2)(C)

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PA Special Condition No. 10F OP Special Terms and Condition 15

Description:

failure to monitor 59 valves that were marked as unsafe to monitor during the third

quarter of 2004 form August 19, 2004 through September 30, 2004.

Classification: Minor Self Report? NO

30 TAC Chapter 115, SubChapter D 115.354(5) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

OP General Terms and Condition Rgmt Prov:

failure to put identification number for the leaking fugitive valves during August 19, 2004 Description:

through August 19, 2005.

Classification: Minor NO Self Report?

30 TAC Chapter 115, SubChapter D 115.354 Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(c)

5C THC Chapter 382, SubChapter A 382.085(b)

OP Special Terms and Condition 15 Ramt Prov:

failure to include 89 connectors, 27 valves, and 19 pumps in the fugitive monitoring Description:

program during the third quarter of 2004 form August 19, 2004 through September 30, 2004.

Minor Classification: NO Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b) Ramt Prov: **OP General Terms and Condition** 

failure to obtain a permit by rule (PBR) for the emission point no. SP-4010 Description:

Classification: NO Self Report?

30 TAC Chapter 122, SubChapter B 122.143(4) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

OP General Terms and Conditions Rqmt Prov:

faiure to seal the external floating roof tank, TK-3112. The gasket on the rim vent was Description:

missina. Classification: Moderate NO

Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

PA SC No 1 of NSR Permit No. 2936. Rgmt Prov:

OP Special Terms and Conditions 15 failure to obtain appropriate authorization for storing hydrocarbons for the tanks, TK-3113

Description:

and TK-3114. Classification: Moderate NO

Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b) PA Special Condition 1 Ramt Prov:

30 TAC Chapter 122, SubChapter B 122.143(4)

OP Special Terms and Condition 15

failure to comply with the pounds per hour of VOC emission limit for tank No. TK-4002 of Description:

TCEQ Air Permit 2936. Classification: Minor Self Report?

30 TAC Chapter 116, SubChapter B 116.110(a)(1) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

**OP General Terms and Conditions** Rgmt Prov: failure to obtain a permit by rule (PBR) for the analyzer vent. Description:

Classification: Minor Self Report? NO

30 TAC Chapter 122, SubChapter B 122.132(a) Citation:

5C THC Chapter 382, SubChapter A 382.085(b) Failure to include all the emission authorizations for the cooling tower were not

Description: represented in the title V permit.

(459500) Date: 03/29/2006

Moderate Classification: Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

PERMIT TCEQ Permit No. 2128 Ramt Prov:

Failure to prevent the release of unauthorized emissions from a railroad tank car PSV. Description:

Date: 03/31/2006 (455940)

Classification: Minor NO Self Report?

30 TAC Chapter 122, SubChapter B 122.142(b)(2)[G] Citation: 5C THC Chapter 382, SubChapter D 382.085(b) Failure to represent the two sources that are subject to 30 TAC 111 rules in the Title V Description:

Operating Permit O-02175. Classification: Moderate

NO Self Report? 30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

**PERMIT 6245, SC 1** Rqmt Prov: OP 002175, STC 10

Description: Failure to operate tanks (TK30 & TK31) within maximum allowable emission rates as permitted in the NSR permit 6245. Self Report? NO Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122,143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: PERMIT 6245, SC 7.E OP 002175, STC 10 OP 002175, STC 1A Description: Failure to cap or plug the thirty-eight (38) open-ended lines in VOC service (C5 recovery Self Report? NC Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a) 5C THC Chapter 382, SubChapter D 382.085(b) Rgmt Prov: OP 002175, STC 1A Description: Failure to equip the dimer drum feed sampling connection system with closed loop. Self Report? Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1) 5C THC Chapter 382, SubChapter D 382.085(b) Ramt Prov: OP 002175, STC 1A Description: Failure to have required information on tags attached to visual fugitive leaks Self Report? NΩ Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.352[G] 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a) 5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov: PERMIT 6245, SC 7 OP 002175, STC 10 OP 002175, STC 1A Description: Failure to include 2 pumps, 32 valves, and 103 connectors in the C5 recovery unit in fugitive monitoring database. Date: 05/16/2006 (463873)Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: PERMIT TCEQ Permit No. 2128 Description:

Failure to prevent the release of unauthorized emissions from a leaking pipeline due to

the removal of a blind.

Date: 05/24/2006 (465260)

Rgmt Prov:

Self Report? Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)[G]

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to correctly represent the HON storage vessel provisions, HON container

provisions, and 30 TAC 111 rules in the Title V Operating Permit O-02185.

Classification:

Moderate

Self Report? Classification: Moderate Citation:

30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A) 30 TAC Chapter 116, SubChapter B 116,115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart G 63.119(c)(2)(ii)

5C THC Chapter 382, SubChapter D 382.085(b) OP O-02185, STC 16

OP O-02185, STC 1A PERMIT Permit 6387, SC 2 Description:

Failure to equip gasket on sample hatch cover and failure to have physical fasteners on float well cover on external floating roof tank (Tank 26).

Self Report? NO

Classification: Moderate 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A) Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart G 63.119(b)(6)

Ramt Prov: PERMIT 6387, SC 2

OP O-02185, STC 16 OP O-02185, STC 1A

Description: Failure to cover all the openings on internal floating roof tanks: Tank 37 and Tank 47 and failure to have physical fasteners on float well covers on internal floating roof tanks: Tank

37, 48, and 49,

Self Report? NO Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Part 63, Subpart G 63.119(b)(1)[G] 5C THC Chapter 382, SubChapter D 382.085(b)

PERMIT 6387, SC 2 Rqmt Prov:

OP O-02185, STC 1.A OP O-02185, STC 16

Description:

Failure to keep the floating roof of Tank 47 always in contact with liquid surface during

Moderate

Minor

Classification:

Classification:

the regular operations.

Self Report? NO 30 TAC Chapter 116, SubChapter B 116.110(a) Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

**PERMIT 6387, SC 4.A** Ramt Prov: OP O-02185, STC 16

Failure to obtain authorization for the emissions resulted from analyzer vents in the Description:

MTBE Unit

Self Report? NO 30 TAC Chapter 115, SubChapter D 115.352(4) Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

**PERMIT 6387, SC 2** Ramt Prov: OP O-02185, STC 1.A

OP O-02185, STC 16

Failure to cap or plug the sixty-one (61) open-ended lines in VOC service in MTBE Unit. Description:

Minor Classification: Self Report? NO

30 TAC Chapter 115, SubChapter D 115.354(5) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

OP O-02185, STC 1.A Ramt Prov:

Failure to have required information on tags attached to visual fugitive leaks in the MTBE Description:

Unit.

Classification: Minor NO Self Report?

30 TAC Chapter 115, SubChapter D 115.352[G] Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(a)[G]

5C THC Chapter 382, SubChapter D 382.085(b)

PERMIT 6387, SC 5 Rgmt Prov:

OP O-02185, STC 1.A OP O-02185, STC 16

Failure to include 2 valves in the MTBE Unit in fugitive monitoring database and comply Description:

with the fugitive monitoring requirements.

Moderate Classification: Self Report?

30 TAC Chapter 115, SubChapter B 115.142[G] Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

OP O-02185, SC 5 Ramt Prov: Failure to control the one wastewater stream (T-1215) as required by 30 TAC 115.142 in Description:

MTRF Unit. Minor Classification: NO Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(C)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(9) PERMIT 6387, SC 2

Rqmt Prov: OP O-02185, STC 1.A OP 0-02185, STC 16

Failure to make the tank seal inspection (Tank-26) notification 30 days in advance in Description:

Moderate Classification: Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)

PERMIT 6387, SC 2 Rgmt Prov: OP O-02185, STC 1.A

OP O-02185, STC 16 Failure to comply with HON process wastewater provisions for two containers in MTBE

Date: 06/26/2006 (464019)

Description:

Moderate Classification: Self Report?

30 TAC Chapter 319, SubChapter A 319.7(a)[G] Citation: PERMIT 00391-000

Rgmt Prov: Failure to document the sample collection time and the identify of the sample personnel Description:

for the Outfall 001

24 hour composite samples.

Date: 07/28/2006

(484749)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c)

Citation:

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT No. 22779, Special Condition No. 1 Equistar failed to prevent this emissions event

Description: Date: 08/15/2006

(489890)

Self Report?

30 TAC Chapter 335, SubChapter A 335.6(c)

Citation: Description:

Failure to update Notice of Registration

Date: 08/16/2006

(457265)

Citation:

Self Report?

30 TAC Chapter 115, SubChapter C 115.212(a)(1)[G]

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b)

5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Citation

Failure to control emissions from drum D3075 and from tank TK20.

Self Report? NO

30 TAC Chapter 115, SubChapter D 115,352(4)

30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

PERMIT 2128, SC 10E OP O-02184, ST&C 18 OP O-02184, ST&C 1A

Description:

Failure to cap or plug 174 open ended lines in VOC service.

Self Report?

Classification:

Moderate

Minor

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Failure to have a Startup/Shutdown/Malfunction plan to address visible emissions from

east plant flare. NO

Self Report?

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

Citation:

OP O-02184, ST&C 1A

Description:

Self Report?

Failure to conduct monthly monitoring on 4 HON pumps in January 2005.

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.166(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Rgmt Prov:

OP O-02184, ST&C 1A

Description: Failure to equip a sample point with a closed loop system on reactor effluent and T1204

overhead.

Self Report? NO

30 TAC Chapter 115, SubChapter D 115.354(5)

30 TAC Chapter 115, SubChapter H 115.782(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

Citation:

OP O-02184, ST&C 1H

Description:

Citation:

Failure to have identification numbers on the fugitive leak tags attached to 51

components.

Self Report? NO

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

30 TAC Chapter 122, SubChapter B 122.132(a) 5C THC Chapter 382, SubChapter D 382.085(b)

Description: Self Report?

Failure to authorize emissions from sampling in the tank farm.

Citation:

30 TAC Chapter 115, SubChapter D 115.352(1)[G] 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122,143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

PERMIT 2128, SC 10 OP O-02184, ST&C 18

OP O-02184, ST&C 1A

Description:

Failure to include 16 pumps, 45 valves, and 292 connectors in the fugitive monitoring

database

Self Report? NO Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: OP O-02184, ST&C 13

Failure to control emissions from 3 wastewater streams (D-78, D-3055, D-03102). Description:

Date: 11/30/2006 (544284)

YES Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Description:

Failure to meet the limit for one or more permit parameter

Date: 02/01/2007 (538420)

Self Report?

Citation:

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

PERMIT 2933 Special Condition 1

Rgmt Prov:

Failure to prevent process water collection system back-up which resulted in unauthorized emissions. Description:

Date: 04/11/2007 (532608)

Self Report? NO Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Citation:

30 TAC Chapter 122, SubChapter B 122.132(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Failure to include Polyols loading emissions in federal operating permit O-02179. Description:

Environmental audits. F

Notice of Intent Date:

05/30/2002

(32973)

No DOV Associated

06/20/2002

(32977)

Notice of Intent Date: No DOV Associated

(33157)

Notice of Intent Date:

02/03/2003

No DOV Associated

07/26/2005

Notice of Intent Date: No DOV Associated

Notice of Intent Date:

10/06/2005

No DOV Associated

(434934)

(453654)

Notice of Intent Date:

11/28/2006 (534269)

No DOV Associated

Type of environmental management systems (EMSs). G.

Voluntary on-site compliance assessment dates. Н.

Participation in a voluntary pollution reduction program.

Early compliance.

N/A

Sites Outside of Texas

N/A

Policy Revision 2 (Septe		culation Worksheet (F	PCW Revision March 19, 2007
ICEQ DATES Assigned	26-Mar-2007		
	28-Nov-2007 Screening 27-	-Mar-2007 EPA Due	
RESPONDENT/FACILITY	NFORMATION		
Respondent E Reg. Ent. Ref. No.	Equistar Chemicals, LP RN100542281		
Facility/Site Region	12-Houston	Major/Minor Sourc	e Major
CASE INFORMATION			
Enf./Case ID No.	33070 2007-0493-AIR-E	No. of Violation Order Typ	the state of the s
Media Program(s)		Enf. Coordinate	r Terry Murphy n EnforcementTeam 5
Multi-Media Admin. Penalty \$ L	imit Minimum \$0 Max	kimum \$10,000	II Ellior Cement reality
		Calculation Section	***************************************
	•		Subtotal 1 \$19,700
,	TY (Sum of violation base	s penantes)	9444944
ADJUSTMENTS (+/-)	TO SUBTOTAL 1  ed by multiplying the Total Base Penalty	(Subtotal 1) by the indicated percentage.	
Compliance Histo	ry	311% Enhancement Sub	ototals 2, 3, & 7 \$61,267
Notes	The penalty was enhanced by two 1660-style orders, and or	42 similar NOVs, 21 dissimilar NOVs, ne findings order, and reduced by six NOAs.	
L	N-	0% Enhancement	Subtotal 4 \$0
Culpability	No		
Notes	The Respondent does	not meet the culpability criteria.	
Good Faith Effort	to Comply  Before NOV NOV to EDPRP/Se	<b>0%</b> Reduction	Subtotal 5 \$0
Extraordinary Ordinary			
N/A	X (mark with x)		· 
Notes	The Respondent does	not meet the good faith criteria.	
		0% Enhancement* *Capped at the Total EB \$ Amount	Subtotal 6 \$0
Approx. 0	Total EB Amounts \$6,503 Cost of Compliance \$12,300	Capped at the Total EB \$ Amount	
SUM OF SUBTOTALS	\$1.7		Final Subtotal \$80,967
OTHER FACTORS AS	S JUSTICE MAY REQUIRE ubtotal by the indicated percentage. (English	<b>5%</b> 6% ter number only; e.g30 for -30%.)	Adjustment \$5,000
Notes		ssociated with Violation 6.	
110100			Penalty Amount \$85,967
		Finai r	Penalty Amount \$85,967
STATUTORY LIMIT A	DJUSTMENT	Final As	sessed Penalty \$85,967
DEFERRAL Reduces the Final Assessed Pen	alty by the indicted percentage. (Enter n	20% Reduction umber only; e.g. 20 for 20% reduction.)	Adjustment -\$17,193
Notes	Deferral offered	for expedited settlement.	
PAYABLE PENALTY			\$68,774
LAIADLE LENALII			

Docket No. 2007-0493-AIR-E

Policy Revision 2 (September 2002) PCW Revision March 19, 2007

Respondent Equistar Chemicals, LP
Case ID No. 33070
Reg. Ent. Reference No. RN100542281

liance Histor	Compliance History Worksheet  9 Site Enhancement (Subtotal 2)		
Component		nter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	42	210%
	Other written NOVs	21	42%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	2	40%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	isteri istinilia ya	25%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	Ö	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	- 0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	6	-6%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
	Plea	se Enter Yes or No	
	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
Othor	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment P	ercentage (Su	ıbtotal 2)
t Violator (Sι	ibtotal 3)		
No	Adjustment P	ercentage (Su	ibtotal 3)
liance Histor	y Person Classification (Subtotal 7)		
Average P	Performer Adjustment P	ercentage (Su	btotal 7)
liance Histor	y Summary		
Compliance History	The penalty was enhanced by 42 similar NOVs, 21 dissimilar NOVs, two 1660-style orders, a order, and reduced by six NOAs.	nd one findings	

Respondent Equistar Chemicals, LP Case ID No. 33070  Reg. Ent. Reference No. RN100542281  Media [Statute] Air Enf. Coordinator Terry Murphy Violation Number Rule Cite(s)  Federal Operating Permit O-02181, Special Terms and Conditions ("STC"), 1.A., 30 Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 Code of Federal Regulations ("CFR") § 63.127(b)(2), and Tex. Health & Safety Code § 382.085(b)  Violation Description  Violation Description  Violation Description  Violation Permit O-02181, Special Terms and Conditions ("STC"), 1.A., 30 Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 Code of Federal Regulations ("CFR") § 63.127(b)(2), and Tex. Health & Safety Code § 382.085(b)  Violation Description  Violation Description  Violation Description  Property and Human Health Matrix Harm Release Major Moderate Minor Actual A
Reg. Ent. Reference No. RN100542281  Media [Statute] Air  Enf. Coordinator Terry Murphy Violation Number Rule Cite(s)  Federal Operating Permit O-02181, Special Terms and Conditions ("STC"), 1.A., 30 Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 Code of Federal Regulations ("CFR") § 63.127(b)(2), and Tex. Health & Safety Code § 382.085(b)  Falled to demonstrate the use of a continuous monitoring recorder on the Methanol Skid (ECULPAMEON), Specifically, the Respondent was required to continuously monitor the emissions control device for the Skid with a recorder, but the Respondent reported that the records from July 11, 2005 through September 17, 2005 were discarded.  **September 17, 2005 were discarded.**  **Base Penalty**  **September 17, 2005 were discarded.**  **Percent**  OR  **Actual** Potential**  **Percent**  **Percent**  10%  **Percent**  Image: Actual** Potential**  **Percent**  **Image: Actual** Potential**  **Percent**  **Image: Actual** Potential**  **Percent**  **Image: Actual** Potential**  **Percent**  **Image: Actual** Potential**  **Percent**  10%  **Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  **Adjustment**  **September**  **September**  **September**  **September**  **Percent**  10%  **September**  **Percent**  10%  **September**  **Percent**  10%  **
Media   Statute  Air   Enf. Coordinator Terry Murphy
Enf. Coordinator Terry Murphy  Violation Number  Rule Cite(s)  Federal Operating Permit O-02181, Special Terms and Conditions ("STC"), 1.A., 30 Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 Code of Federal Regulations ("CFR") § 63.127(b)(2), and Tex. Heath & Safety Code § 382.085(b)  Failed to demonstrate the use of a continuous monitoring recorder on the Methanol Skid (ECULR2NECH). Specifically, the Respondent was required to continuously monitor the emissions control device for the Skid with a recorder, but the Respondent reported that the records from July 11, 2005 through September 17, 2005 were discarded.  Base Penalty  \$10,000  >> Environmental, Property and Human Health Matrix. Harm Release Major Moderate Minor Actual Potential X Percent 10%  >> Programmatic Matrix  Falsification Major Moderate Minor  Falsification Major Moderate Minor  Percent 0%  Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  Adjustment \$9,000  Violation Events  Number of Violation Events 1 68 Number of violation days  4 daily monthly
Violation Number   1   Federal Operating Permit O-02181, Special Terms and Conditions ("STC"), 1.A., 30   Tex. Admin. Code §§ 101, 20(2) and 122.143(4), 40 Code of Federal Regulations ("CFR") § 83.127(b)(2), and Tex. Health & Safety Code § 382.085(b)   Failed to demonstrate the use of a continuous monitoring recorder on the Methanol Skid (ECULR2MEOH). Specifically, the Respondent was required to continuously monitor the emissions control device for the Skid with a recorder, but the Respondent reported that the records from July 11, 2005 through September 17, 2005 were discarded.   Sase Penalty   S10,000
Tex. Admin. Code §§ 101.20(2) and 122.143(4), 40 Code of Federal Regulations ("CFR") § 63.127(b)(2), and Tex. Health & Safety Code § 382.085(b)  Failed to demonstrate the use of a continuous monitoring recorder on the Methanol Skid (ECULR/MEOH). Specifically, the Respondent was required to continuously monitor the emissions control device for the Skid with a recorder, but the Respondent reported that the records from July 11, 2005 through September 17, 2005 were discarded.    Base Penalty   \$10,000
Skid (ECULR2MEOH). Specifically, the Respondent was required to continuously monitor the emissions control device for the Skid with a recorder, but the Respondent reported that the records from July 11, 2005 through September 17, 2005 were discarded.    Base Penalty
>> Environmental, Property and Human Health Matrix    Harm   Release   Major   Moderate   Minor
OR Release Major Moderate Minor Actual Potential X Percent 10%  >>Programmatic Matrix Falsification Major Moderate Minor
OR Release Major Moderate Minor Actual Potential X Percent 10%  >>Programmatic Matrix Falsification Major Moderate Minor Falsification Major Moderate Minor Falsification Major Moderate Minor Fercent 0%  Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  Adjustment \$9,000  Violation Events  Number of Violation Events 1 68 Number of violation days  daily monthly quarterly Violation Base Penalty \$1,000
OR Actual Potential X Percent 10%  >>Programmatic Matrix Falsification Major Moderate Minor Percent 0%  Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  Adjustment \$9,000  Violation Events  Number of Violation Events 1 68 Number of violation days  daily monthly quarterly Violation Base Penalty \$1,000
>>Programmatic Matrix Falsification Major Moderate Minor Percent 0%  Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  Adjustment \$9,000  \$1,000  Violation Events  Number of Violation Events 1 68 Number of violation days  daily monthly quarterly Violation Base Penalty \$1,000
Falsification Major Moderate Minor  Percent 0%  Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  **Adjustment**  **Adjustment**  \$9,000  **S1,000  Violation Events**  Number of Violation Events**    Matrix   Notes   1
Falsification Major Moderate Minor  Percent 0%  Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  **Adjustment**  **Adjustment**  \$9,000  **S1,000  Violation Events**  Number of Violation Events**    Matrix   Notes   1
Human health or the environment could have been exposed to insignificant amounts of pollutants not exceeding levels protective of human health or environmental receptors as a result of the violations. The Respondent reported that it manually recorded the required data during the period of time the recorder was out of service.  Adjustment \$9,000  Violation Events  Number of Violation Events 1 68 Number of violation days  daily monthly quarterly Violation Base Penalty \$1,000
Matrix Notes  Ma
Violation Events  Number of Violation Events  1 68 Number of violation days  daily monthly quarterly Violation Base Penalty \$1,000
Violation Events  Number of Violation Events  1 68 Number of violation days  daily monthly quarterly Violation Base Penalty \$1,000
Violation Events  Number of Violation Events  1 68 Number of violation days  daily monthly mark only one quarterly Violation Base Penalty \$1,000
Number of Violation Events 1 68 Number of violation days  daily
daily monthly duarterly Violation Base Penalty \$1,000
mark only one quarterly Violation Base Penalty \$1,000
with an x semiannual annual single event x
One single event is recommended.
Economic Benefit (EB) for this violation Statutory Limit Test
Estimated EB Amount \$180 Violation Final Penalty Total \$4,364
This violation Final Assessed Penalty (adjusted for limits) \$4,364

Respondent	<b>⊑</b> Equistar Chemi		Benefit W	'orksh	neet		2-1-5X
Case ID No	33070						
Reg. Ent. Reference No	RN100542281						
Media						Percent Interest	Years of
Violation No	. 1					Percent interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs I	Interest Saved	\$	EB Amount
Item Description							
nom passipasi	i No commas di 9						***
Delayed Costs	2						
Equipment	\$1,500	11-Jul-2005	29-Mar-2007	1.7	\$9	\$172	\$180
Buildings	7.17.7		15 9 4 26 2 1 20 2	0,0	\$0	\$0	\$0
Other (as needed)	900000000000000000000000000000000000000	www.gragarunaer.w	e paratiti din Agrafia	0,0	\$0	\$0	\$0
Engineering/construction	222.46			0.0	\$0	\$0	\$0
Land		2000	NAMES OF TAXABLE	0,0	\$0	n/a	<b>\$</b> 0
Record Keeping System	\$25 000 \$400 mg/11			0,0	\$0	n/a	\$0
Training/Sampling	737 September 2000	1.00	* * * * * * * * * * * * * * * * * * * *	0,0	\$0	n/a	\$0
Remediation/Disposal		E C. A. R. L. M. C.	Aki Qare eta eta eta eta eta eta eta eta eta et	1 0.0 l	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Permit Costs Other (as needed)				0.0	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)  Notes for DELAYED costs	the date the	recorder went out	of service, and the pers	0.0 0.0 /training as Final Dat sonnel train	\$0 \$0 ssociated with the is the date the ning;	n/a n/a ne recorder. The Da Respondent provid	\$0 \$0 ate Required Is led additional
Other (as needed)  Notes for DELAYED costs  Avoided Costs	the date the	recorder went out	of service, and the pers	0.0 0.0 /training as Final Dat sonnel train	\$0 \$0 ssoclated with the list the date the ning. em (except for	n/a n/a ne recorder. The Da Respondent providence one-time avoided o	\$0 \$0 ate Required is (ed additional
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	the date the	recorder went out	of service, and the pers	/training as Final Dat sonnel train	\$0 \$0 ssociated with the is the date the hing, em (except for \$0	n/a n/a ne recorder. The Da Respondent provice one-time avoided of	\$0 \$0 ate Required is led additional
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal  Personnel	the date the	recorder went out	of service, and the pers	7 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.	\$0 \$0 ssociated with the is the date the hing. em (except for \$0 \$0	n/a n/e re recorder. The Da Respondent provided one-time avoided of \$0 \$0	\$0 \$0 ate Required is led additional
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal  Personnel  Inspection/Reporting/Sampling	the date the	recorder went out	of service, and the pers	/training as e Final Dat connel train intering ite	\$0 \$0 ssociated with the is the date the ning. em (except for \$0 \$0	n/a n/a ne recorder. The Da Respondent provio one-time avoided o \$0 \$0 \$0	\$0 \$0 ate Required is led additional costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal  Personnel  Inspection/Reporting/Sampling  Supplies/equipment	the date the	recorder went out	of service, and the pers	7 O.0	\$0 \$0 ssociated with the is the date the ning. em (except for \$0 \$0 \$0	n/a n/a n/e recorder. The Da Respondent provice one-time avoided a \$0 \$0 \$0 \$0 \$0	\$0 \$0 ate Required Is led additional costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment Financial Assurance [2]	the date the	recorder went out	of service, and the pers	/training as a Final Dat sonnel train  intering its   0.0	\$0 \$0 ssociated with the is the date the ning. em (except for \$0 \$0 \$0 \$0	n/a n/e ne recorder. The Da Respondent provid sone-time avoided a \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 ate Required is led additional costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	the date the	recorder went out	of service, and the pers	7 O.0	\$0 \$0 ssociated with the is the date the ning. em (except for \$0 \$0 \$0	n/a n/a n/e recorder. The Da Respondent provice one-time avoided a \$0 \$0 \$0 \$0 \$0	\$0 \$0 ate Required Is led additional costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment Financial Assurance [2]	the date the	recorder went out	of service, and the pers	/training as e Final Dat sonnel train  ntering ite  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0	\$0 \$0 ssociated with the is the date the ning.  em (except for \$0 \$0 \$0 \$0 \$0	n/a n/a n/e recorder. The Da Respondent provio	\$0 \$0 ate Required Is led additional costs) \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	the date the	recorder went out	of service, and the pers	/training as e Final Dat sonnel train  ntering ite  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0	\$0 \$0 ssociated with the is the date the ning.  em (except for \$0 \$0 \$0 \$0 \$0	n/a n/a n/e recorder. The Da Respondent provio	\$0 \$0 ate Required is led additional costs) \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	the date the	recorder went out	of service, and the pers	/training as e Final Dat sonnel train  ntering ite  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0	\$0 \$0 ssociated with the is the date the ning.  em (except for \$0 \$0 \$0 \$0 \$0	n/a n/a n/e recorder. The Da Respondent provio	\$0 \$0 ate Required is led additional costs) \$0 \$0 \$0 \$0 \$0

Screening Date		Docket I	<b>No.</b> 2007-0493-AIR-E	PCW
\$	Equistar Chemicals, LP		Policy I	Revision 2 (September 2002)
Case ID No.			Po	CW Revision March 19, 2007
Reg. Ent. Reference No. Media [Statute]	Air			***************************************
Enf. Coordinator	T			
Violation Number	<u>                                     </u>			_
Rule Cite(s)	FOP O-02181, STC 6.C.	iv., 30 Tex. Admin. Code Health & Safety Code §	§§ 115.244 and 122.143(4), and Tex. 382.085(b)	***************************************
Violation Description	Respondent reported that required daily inspect	at, from March 3 through N ctions of the Stage II vapo	spensing facilities. Specifically, the March 5, 2006, it failed to perform the recovery system for defects, as ducted on January 29, 2007.	
			Base Penalty	\$10,000
>> Environmental, Property a		atrix		***************************************
Release	<b>Harm</b> Major Moderate	Minor		
OR Actual		Willion		***************************************
Potential		X	Percent 10%	***************************************
			<del></del>	***************************************
>>Programmatic Matrix Falsification	Major Modorato	Minor		anama an
Faisilication	Major Moderate	Minor	Percent 0%	
	<u> </u>		1 ercent	***************************************
Matrix Notes Human healt	th or the environment coulesvels protective of human I	d have been exposed to ir health or environmental re	nsignificant amounts of pollutants not eceptors as a result of the violations.	
			Adjustment \$9,000	
			***************************************	
				\$1,000
Violation Events				
Number of Vio	olation Events 3	3	Number of violation days	
mark only one with an x	daily monthly quarterly		Violation Base Penalty	\$3,000
7737 377	semiannual annual single event x			
	Three si	ngle events are recomme	nded.	
Economic Benefit (EB) for thi			Statutory Limit Test	
Estimated	I EB Amount	\$1	Violation Final Penalty Total	\$13,091
		This violation Final Ass	sessed Penalty (adjusted for limits)	\$13,091

	E	conomic I	Benefit W	orks	heet	Maria de la constanta de la co	
Respondent	Equistar Chemie	cals, LP	***************************************			*** **********************************	
Case ID No.	33070	·					
Reg. Ent. Reference No.							
Media							Years of
Violation No.						Percent Interest	Depreciation
Violation No.	2					5.0	15
		5.5.	E11-D-4-		Interest Saved	Onetime Costs	EB Amount
	Item Cost	Date Required	Final Date	Yrs	Interest Saveu	Otterrine Coara	ED AIIIOUIT
Item Description	No commas or \$						
				hakanstoonav soosi			
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings			55,000	0.0	\$0	\$0	\$0
Other (as needed)			35,1555,655,655	0,0	. \$0	\$0 \$0	\$0
Engineering/construction	0.00	Capitalia (Capita)	Control of the contro	0.0	\$0 \$0	- CORRECTOR OF THE CONTRACTOR OF THE CORP.	\$0 \$0
Land			1000000	0,0	\$0 \$0	n/a n/a	\$0 \$0
Record Keeping System			10.1	222-10-10-10-10-0		n/a	\$1
Training/Sampling	\$200	3-Mar-2006	19-Apr-2006	0.1	\$1		
Remediation/Disposal		4		0.0	\$0	n/a	\$0 \$0
Permit Costs				0.0	\$0 \$0	n/a n/a	\$0 \$0
Other (as needed)				1. 0.0 1	Φ0	i iva i	- ΦU
Notes for DELAYED costs	the first failure	to inspect, and the	e Final Date is the of inspection pro	date the cedures	Respondent repo with its personne		oleted a review
Avoided Costs	ANN	UALIZE [1] avoid	ed costs before e	ntering	item (except for	one-time avoided o	osts)
Disposal	i, e	( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )		0,0	\$0	\$0	\$0
Personnel				0,0	<b>\$</b> O	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0.
Supplies/equipment				0,0	\$0	\$0	\$0
Financial Assurance [2]			10.00	0,0	\$0	\$0	\$0
ONE-TIME avoided costs [3]			Control of the Contro	0.0	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)	1 1010 11 1		A transmission level	0,0	- \$∪	<u>                                     </u>	30 J
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$200			TOTAL		\$1

Screening Date		Docket	<b>No.</b> 2007-0493-AIR-E	PCW
Entre the second of the second	Equistar Chemicals, LP		Policy F	Revision 2 (September 2002)
Case ID No.		•	PC	W Revision March 19, 2007
Reg. Ent. Reference No. Media [Statute]				
Enf. Coordinator				
Violation Number	3			
Rule Cite(s)		and 6 B ii 30 Tex Adm	nin. Code §§ 115.212(a)(3)(A)(ii) and	]
	122.143(4	4), and Tex. Health & Saf	ety Code § 382.085(b)	
	Failed to provide pro	pper emissions control for nat, twice on February 27	waste material. Specifically, the , once on August 27, 2006, it placed	***************************************
Violation Description	volatile organic compou	nds ("VOC") liquids, resid	luals from a transport vessel transfer	***************************************
	operation, into portable o	containers that were not vestigation conducted on J	/apor-tight, as documented during an	***************************************
	IIIVG	sugation conducted on Ja	anuary 29, 2007.	***************************************
				-
			Base Penalty	\$10,000
>> Environmental, Property a		atrix		
Release	Harm Major Moderate	Minor		,
OR Actual		X		
Potential			Percent 25%	
>>Programmatic Matrix				
Falsification	Major Moderate	Minor	******	
			Percent 0%	
· · · · · · · · · · · · · · · · · · ·				1
Matrix Human he	ealth or the environment c	ould were exposed to insi	ignificant amounts of pollutants not	
Notes exceeding lev	vels protective of human h	nealth or environmental re	eceptors as a result of the violations.	
<u> </u>				
			Adjustment \$7,500	
				\$2,500
Violation Events				
Violation Events				
Number of Viol	ation Events 2	3	Number of violation days	***************************************
	delle F			**************************************
	daily monthly			***************************************
mark only one	quarterly x	]	Violation Base Penalty	\$5,000
with an x	semiannual	]		
	annual single event			· · · · · · · · · · · · · · · · · · ·
	¥			***************************************
	-			***************************************
	i wo quar	terly events are recomme	enaea.	outoneenon.
Lancia di Cara				
Economic Benefit (EB) for this	s violation	Section 1	Statutory Limit Test	
Estimated	EB Amount	\$7	Violation Final Penalty Total	\$21,819
			-	
		This violation Final Ass	sessed Penalty (adjusted for limits)	\$21,819

Case ID No.		ilicais, Lr					e jed?"
Reg. Ent. Reference No. Media					•	Percent Interest	Years of
Violation No.						1 Oldone merce.	Depreciation
						5.0	
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0 \$0
Buildings				0.0	\$0	\$0	\$0 \$0
Other (as needed)	3.0			0.0	\$0	\$0 \$0	φυ ∵ \$0
Engineering/construction			Saskgare, description	0.0	\$0 \$0	n/a	\$0
Land		3.000	200 a 100 (200 A 100 )	0.0	\$0	n/a	\$0
Record Keeping System	4000	27-Feb-2006	26-Oct-2006	0.7	\$7	n/a	\$7
Training/Sampling	\$200	27-Feb-2006	26-001-2000	0.0	\$0	n/a	\$0
Remediation/Disposal Permit Costs		S. Control of the Con		0.0	\$0	n/a	\$0
Other (as needed)			anal on waste han	0.0	\$0	n/a	\$0
	reported v	olation, and the Fin	al Date is the date procedure	0.0 dling pro the Res es with it	\$0 ocedures. The Da spondent reported is personnel.	n/a ate Required is the d that it had complete	\$0 ate of the first ed a review of
Other (as needed)  Notes for DELAYED costs	reported v	olation, and the Fin	al Date is the date procedure	0.0 dling pro the Res es with it	\$0 ocedures. The Da spondent reported is personnel.	n/a ite Required is the d ithat it had complete cone-time avoided	\$0 ate of the first ed a review of costs)
Other (as needed)  Notes for DELAYED costs  Avoided Costs	reported v	olation, and the Fin	al Date is the date procedure	0,0 dling pro the Res es with it entering 0,0	\$0 pocedures, The Daspondent reporter (spersonnel, litem (except for \$0.)	n/a tte Required is the d I that it had complete cone-time avoided	\$0 ate of the first ed a review of costs)
Other (as needed)  Notes for DELAYED costs	reported v	olation, and the Fin	al Date is the date procedure	0.0 dling prosente Reses with it	\$0 pocedures. The Daspondent reported is personnel.    item (except for \$0 : \$0 : \$0 : \$0 : \$0   \$0   \$0   \$0	n/a ste Required is the d that it had complete cone-time avoided \$01 \$0	\$0 ate of the first ad a review of costs) \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel	reported v	olation, and the Finance of the Fina	al Date is the date procedure	dling pro the Res swith it chtering 0.0 0.0 0.0	\$0 seedures. The Day spondent reported s personnel, litem (except for \$0: \$0:	n/a ste Required is the d that it had complete cone-time avoided \$01 \$0 \$0 \$0	\$0 ate of the first ad a review of  costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	reported v	olation, and the Finance of the Fina	al Date is the date procedure	dling proesthe Reses with it	\$0 poedures. The Daspondent reporter is personnel.  Item (except for \$0.1) \$0.1 \$0.2 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3	n/a ste Required is the d that it had complete cone-time avoided \$01 \$0, \$0, \$0, \$0, \$0, \$0, \$0, \$0, \$0, \$0,	\$0 ate of the first od a review of costs)  \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling	reported v	olation, and the Finance of the Fina	al Date is the date procedure	dling prosent the Reses with its entering 0.0 0.0 0.0 0.0 0.0 0.0	\$0 coedures. The Daspondent reported is personnel.  Item (except for \$0 : \$0 : \$0 : \$0 : \$0 : \$0 : \$0 : \$0	n/a  ate Required is the d that it had complete  cone-time avoided \$0: \$0. \$0. \$0. \$0. \$0.	\$0 ate of the first at a review of \$0 costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	AN	olation, and the Finance of the Fina	al Date is the date procedure	0.0  dling pro a the Res es with it  0.0  0.0  0.0  0.0  0.0  0.0  0.0  0	\$0 seedures. The Da spondent reported is personnel.  Item (except for \$0   \$0   \$0   \$0   \$0   \$0   \$0	n/a ate Required is the d that it had complete cone-time avoided \$0: \$0: \$0: \$0 \$0 \$0 \$0 \$0	\$0 ate of the first day review of \$0  costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	reported v	olation, and the Finance of the Fina	al Date is the date procedure	dling prosent the Reses with its entering 0.0 0.0 0.0 0.0 0.0 0.0	\$0 coedures. The Daspondent reported is personnel.  Item (except for \$0 : \$0 : \$0 : \$0 : \$0 : \$0 : \$0 : \$0	n/a  ate Required is the d that it had complete  cone-time avoided \$0: \$0. \$0. \$0. \$0. \$0.	\$0 ate of the first at a review of \$0 costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	AN	olation, and the Fin	al Date is the date procedure	dling prosent the Research III of the Research	\$0 poedures. The Daspondent reported is personnel.  Item (except for \$0.3) \$0.3 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3 \$0.3	n/a  ate Required is the d that it had complete  one-time avoided  \$01  \$01  \$0  \$0  \$0  \$0  \$0  \$0  \$0	\$0 ate of the first od a review of solution (a review of solution) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date Respondent Case ID No. Reg. Ent. Reference No. Media [Statute]	Equistar Chemicals, LP 33070 RN100542281	Docket I	<b>No.</b> 2007-0493-AIR-E	PCW Policy Revision 2 (September 200: PCW Revision March 19, 200
Enf. Coordinator Violation Number Rule Cite(s)	4 FOP O-02181, STC 1.A and	. and 7.A., 30 Tex. Admin.d Tex. Health & Safety Constitution on engine operati	de § 382.085(b)	
Violation Description	area. Specifically, the through November 9, 20 (EUTP803A and EU	Respondent reported that, 005, it conducted testing o JTP803B) during the restri uring an investigation cond	on four occasions from 0 r maintenance on two die icted hours of 6 a.m. to no	October 19 esel engines oon, as
-> Environmental, Property a	nd Human Health M	afrix	В	Base Penalty \$10,00
Release OR Actual Potential	Harm Major Moderate		Percent 25%	<del>%</del>
>>Programmatic Matrix Falsification	Major Moderate	Minor	Percent 0%	<b>%</b>
		e exposed to insignificant h or environmental recepto		and the first of Tay II
			Adjustment	\$7,500] \$2,50
<b>Violation Events</b> Number of Vio	olation Events 1	4	Number of violation o	days
mark only one with an x	daily monthly quarterly x semiannual annual single event		Violation B	Base Penalty \$2,50
	One qu	uarterly event is recomme	nded.	
Economic Benefit (EB) for th	is violation		Statutory Limit 7	Test
Estimated	i EB Amount	\$5	Violation Final P	Penalty Total \$10,91
		This violation Final As	sessed Penalty (adjuste	ed for limits) \$10,91

	33070 RN100542281						es flores
Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	1:
Name Danas de Oraș	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	- No commas or \$						
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings	9,126		Secretarion Secretaria	0.0	\$0	\$0	\$0
Other (as needed)	# M XX 10 (961 (1))		70 e - 10 2 Q F e	0.0	\$0	\$0	\$0
Engineering/construction			<u> </u>	0.0	\$0 \$0	\$0 b/e	\$0 \$0
Land Record Keeping System		100000000000000000000000000000000000000		0.0	\$0 \$0	n/a	\$0
Training/Sampling	\$200	19-Oct-2005	19-Apr-2006	0.5	\$5	n/a	\$5
Remediation/Disposal	φζΟΟ	18-Ou-2003	19-Mp1-2000	0.0	\$0	n/a	\$0 \$0
Permit Costs	COCCCCCCC CARROCK FO			0.0	\$0 \$0	n/a	\$0 \$0
Other (as needed)				0.0	\$0	n/a	\$0
Avoided Costs	ANN	UALIZE [1] avoide		ntering i	\$0	one-time avoided o	osts) \$0 \$0
Disposal							
Personnel	33 5 6 6xx	200		0.0	\$0 °	\$0 \$0	
Personnel Inspection/Reporting/Sampling		2.36		0.0	\$0	\$0	\$0
Personnel	AND THE RESERVE THE PROPERTY OF THE PROPERTY O						
Personnel Inspection/Reporting/Sampling Supplies/equipment				0.0 0.0 0.0 0.0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0
Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	A STATE OF S			0,0 0,0 0,0	\$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0

Screening Date	27-Mar-2007	Docket I	<b>No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP			Policy Revision 2 (September 2002)
Case ID No.				PCW Revision March 19, 2007
Reg. Ent. Reference No.				
Media [Statute]				
Enf. Coordinator Violation Number				
Rule Cite(s)	<u></u>	4.A. and 7.E. 20.Toy, Ad	min. Code §§ 117.219(f)(10) a	
Tule 5.15(5)		4), and Tex. Health & Safe		ing .
Violation Description	nonattainment area. Spe times on November 1	ecifically, the Respondent	esel engine operating in an oz reported that it failed to record UTEN1, as documented durin anuary 29, 2007.	d those
			Base	Penalty \$10,000
>> Environmental, Property a	ind Human Health Ma	atrix		Contraction
	Harm			***************************************
Release OR Actual	Major Moderate	Minor		-
Potential			Percent 0%	***************************************
			.000.200200	***************************************
>>Programmatic Matrix				***************************************
Falsification	Major Moderate	Minor x	Percent 1%	***************************************
<u> </u>	L.		reicent 1/6	
Matrix Notes	Equistar failed to	o comply with less than 30	0% of the rule.	19 40 60 61 13 60 60 61 13 60 60 61 13 60 60 61
			Adjustment	\$9,900
				***************************************
		į.		\$100
Violation Events			A-1-10000000000000000000000000000000000	
				***************************************
Number of Vic	olation Events 1		Number of violation days	
mark only one with an x	daily monthly quarterly semiannual annual single event x		Violation Base	Penalty \$100
		single event is recommend		
Economic Benefit (EB) for th	is violation		Statutory Limit Test	
Estimated	d EB Amount	\$4	Violation Final Penal	ty Total \$436
		This violation Final As	sessed Penalty (adjusted for	' limits) \$436

		conomic <b>E</b>	Benefit W	orks	heet	1000	
Respondent Case ID No.		icals, LP					737
Reg. Ent. Reference No.							and the second
Media						Danasat latareat	Years of
Violation No.	5					Percent Interest	Depreciation
						5.0	15
100000000000000000000000000000000000000	Item Cost	Date Required	Final Date	arY	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
::							
Delayed Costs							
Equipment			Access (1000)	0.0	\$0	\$0	\$0
Buildings	2.000.000.000		1.65012303481313333	0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction	100000000000000000000000000000000000000			0,0	\$0 \$0	\$0 n/a	\$0 \$0
Land Record Keeping System	246 S 34 35 4 174 year		**************************************	0.0	\$0 \$0	n/a n/a	\$0 \$0
Training/Sampling	\$200	17+Nov-2005	19-Apr-2006	0.4	\$4	n/a	\$4
Remediation/Disposal	ΨΖΟΟ	7-1107-2000	13-701-2000	0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs	violation, and	the Final Date is th	ne date the Respo with	ondent re its perso	ported that it had onnel.	Required is the date completed a review	of procedures
Avoided Costs	ANN	UALIZE [1] avoide	d costs before e	110 00000000000000000000000000000000000		one-time avoided o	
Disposal		4.00	<u>r</u>	0,0	\$0	\$0 \$0	\$0 \$0
Personnel		4.5		0.0	\$0 \$0	\$0 \$0	\$0 \$0
inspection/Reporting/Sampling Supplies/equipment				0.0	\$0	\$0 \$0	\$0
Financial Assurance [2]				0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.0	* \$0	\$0	\$0
Other (as needed)		0.000		0.0	\$0	\$0	\$0
Notes for AVOIDED costs				1478			
Approx. Cost of Compliance		\$200			TOTAL		\$4

Compared to the second of the s

Screening Date 27-Mar-2007 Docket No. 2007-0493-AIR-E	PCW
334 (1993)	vision 2 (September 200)
Case ID No. 33070 PCV Reg. Ent. Reference No. RN100542281	V Revision March 19, 20
Media [Statute] Air	
Enf, Coordinator Terry Murphy	
Violation Number 6	
Rule Cite(s) FOP O-02181, STC 1.A., 30 Tex. Admin. Code § 115.144(4)(A), and Tex. Health & Safety Code § 382.085(b)	
Violation Description  Failed to demonstrate VOC reduction efficiency for the ECUABEAST bio-treatment unit. Specifically, this unit was in operation since 1997, and was required to have its reduction efficiency demonstrated by December 31, 2002, but the Respondent failed to make that demonstration, as documented during an investigation conducted on January 29, 2007.	
Base Penalty [	\$10,00
> Environmental, Property and Human Health Matrix	
Harm Release Major Moderate Minor	
OR Actual	
Potential X Percent 10%	
>Programmatic Matrix	
Falsification Major Moderate Minor	•
Percent 0%	
Matrix Human health or the environment could have been exposed to insignificant amounts of pollutants not	
Notes exceeding levels protective of human health or environmental receptors as a result of the violation.	
Adjustment \$9,000	
	\$1,0
/iolation Events	
Number of Violation Events 1 1,114 Number of violation days	
daily	
monthly  mark only one quarterly Violation Base Penalty	\$1,00
with an x semiannual	
annual	
single event x	
One single event is recommended.	
# はおからしており、たいし、 ・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	
Economic Benefit (EB) for this violation Statutory Limit Test	
Economic Benefit (EB) for this violation  Statutory Limit Test  Estimated EB Amount \$5,992  Violation Final Penalty Total	, \$4,36

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Respondent Case ID No. Reg. Ent. Reference No. Media Violation No.	33070 RN100542281 Air						N + 2 +
leg, Ent, Reference No. Media	RN100542281 Air						
Media	Air					Č.	A 10 A
	2						Years of
Violation No.						Percent Interest	Depreciation
	ь						
						5.0	15]
	Item Cost	Date Required	Final Date	Yrs Ir	nterest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
					07-04-07-04-07-07-07-07-07-07-07-07-07-07-07-07-07-		
Delayed Costs							
Equipment				0.0	\$0	\$0	\$0
Buildings	0.0000000000000000000000000000000000000		200,000,000,000,000,000,000,000,000,000	0.0	\$0	\$0	\$0
Other (as needed)			ar.	0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	** \$0
Land				0,0	\$0	n/a	\$0 80
Record Keeping System				0,0	\$0	n/a	\$0 \$0
Training/Sampling	2814506344554			0.0	\$0 \$0	n/a n/a	
Remediation/Disposal	<u> </u>			0.0	\$0 \$0		\$0 \$0
Permit Costs Other (as needed)			<u> </u>	0.0	\$0 \$0	n/a	
			78085338833783	<u>  0.0                                  </u>	ΨΟ	l n/a	\$0
Notes for DELAYED costs		3		<u>                                     </u>	φο	IVa	\$0
Notes for DELAYED costs  Avoided Costs	ANN	NUALIZE [1] avoide	ed costs before e	ntering ite	m (except for	one-time avoided o	costs)
Avoided Costs	ANN		ed costs before e	ntering ite	m (except for	one-time avoided o	;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;;
Avoided Costs Disposal Personnel	ANN	NUALIZE [1] avoide	ed costs before e	ntering ite	m (except for \$0 \$0	one-time avoided o	\$0 \$0
Avoided Costs Disposal Personnel rspection/Reporting/Sampling	ANN		ed costs before e	ntering ite	m (except for \$0 \$0 \$0	one-time avoided o	\$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment	ANN		ed costs before e	ntering Ite   0.0	m (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]				ntering ite   0.0	m (except for \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/equipment	\$5,000		ed costs before e	ntering Ite   0.0	m (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0

Screening Date	27-Mar-2007	Docket	<b>No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP			Policy Revision 2 (September 2002)
Case ID No.				PCW Revision March 19, 2007
Reg. Ent. Reference No.				
Media [Statute]				
Enf. Coordinator Violation Number				
Rule Cite(s)		51 B		
Rule Cite(s)	30 Tex. Admin. Code	§ 115.725(d)(1) and Tex.	Health & Safety Code § 382.0	)85(b)
Violation Description	reported that it was requand 1701 (highly reactive 2006, but did not perforn	uired to perform initial flar e volatile organic compou	ions. Specifically, the Resporte analyzer calibrations on Flands abatement devices) by JaJune 16, 2006, as documente January 29, 2007.	res 607 anuary 1,
			Base	Penalty \$10,000
>> Environmental, Property a		atrix		
Release	Harm Major Moderate	Minor		
OR Actual Potential		X	Percent 10%	
>>Programmatic Matrix	Major Madarata	Minor		
Falsification	Major Moderate	Minor	Percent 0%	
<u> </u>	<u>                                     </u>		reiceit 070	
			insignificant amounts of pollu	
Notes exceeding le	evels protective of numan	nealth or environmental i	receptors as a result of the vic	nations.
[ <del></del>				
			Adjustment	\$9,000
				\$1,000
				φ1,000
Violation Events				
	2	166	Number of violation days	S
	daily			
•	monthly		VI 1 41 - 12	<b>P</b> # <b>C</b> 000
mark only one with an x	quarterly		Violation Base	Penalty \$2,000
min arr x	annual			
	single event x			
	Two si	ngle events are recomme	ended.	
Economic Benefit (EB) for th	is violation		Statutory Limit Tes	t
Estimated	d EB Amount	\$126	Violation Final Pena	alty Total \$8,728
		This violation Final A	paged Danalty (adjusted for	or limita) ¢0 700
10 (A)		illis violation Final As	ssessed Penalty (adjusted fo	or limits) \$8,728

Respondent	Equistar Chem			00	heet		
Case ID No.	33070	ileuie, mi					
Reg. Ent. Reference No. Media Violation No.	Air					Percent Interest	Years of Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
ltem Description	No commas or \$						
Delayed Costs		11 11		1 o.o f	eo.	l eo l	<b>#</b> 0
Equipment Buildings			<u> </u>	0.0	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.0	\$0	\$6	\$0
Engineering/construction	\$1,000	1-Jan-2006	16-Jun-2006	0.5	\$2	\$30	\$32
Land	HAVE COURTER FAR			0.0	\$0	n/a	\$0
Record Keeping System		12.00 (A)	2756000 275267-20	0.0	\$0	n/a	\$0
Training/Sampling				0,0	\$0	n/a	\$0
Remediation/Disposal	a. Zahoviny (1)			0,0	\$0	n/a	\$0
Permit Costs			acadalan caratalah karasa	1 o.o l	\$0	n/a	\$0
Other (as needed)	\$1,000 Estimated of	1-Jan-2006 costs to calibrate fla	19-Nov-2007 res (\$1,000) and	1,9	\$94	n/a ore timely provide ca	\$94
Other (as needed)  Notes for DELAYED costs	Estimated ( (\$1,000), T	costs to calibrate fla he Date Required is t reported the calibr	res (\$1,000) and the date calibrat ations had been o	1.9 to work w lons were completed	\$94 with supplier to me due, and the ca d. November 19	n/a ore timely provide ca libration Final Date I 2007 is the date the	\$94 alibration gas s the date the Respondent
Notes for DELAYED costs	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work w ions were completed sues with	\$94 with supplier to mediue, and the ca d. November 19 the supplier had	n/a ore timely provide ca libration Final Date I 2007 is the date the been resolved,	\$94 alibration gas s the date the Respondent
Notes for DELAYED costs  Avoided Costs	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work were completed sues with	\$94  with supplier to m due, and the ca November 19 the supplier had tem (except for	n/a ore timely provide ca libration Final Date I. 2007 is the date the been resolved.	\$94 alibration gas s the date the Respondent
Notes for DELAYED costs	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work w ions were completed sues with	\$94 with supplier to mediue, and the ca d. November 19 the supplier had	n/a ore timely provide ca libration Final Date I 2007 is the date the been resolved,	\$94 alibration gas s the date the Respondent
Notes for DELAYED costs  Avoided Costs  Disposal	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work were completed sues with	\$94  with supplier to me to due, and the call. November 19, the supplier had tem (except for \$0	n/a ore timely provide ca libration Final Date is 2007 is the date the been resolved.	\$94 alibration gas s the date the Respondent
Notes for DELAYED costs  AVOIDED COSTS  Disposal Personnel	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work work work work work work work wor	\$94  with supplier to m due, and the ca November 19 the supplier had tem (except for \$0 \$0 \$0 \$0 \$0	n/a ore timely provide or libration Final Date it 2007 is the date the been resolved, one-time avoided of \$0 \$0 \$0 \$0 \$0	\$94 allibration gas s the date the a Respondent costs) \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work work work work work work work wor	\$94  with supplier to m due, and the ca November 19 the supplier had tem (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a ore timely provide ca libration Final Date is 2007 is the date the been resolved, from one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	\$94 alibration gas s the date the e Respondent costs) s0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  AVOIDED COSTS Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work were completed sues with ntering 1 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	\$94  //th supplier to me due, and the call. November 19  the supplier had tem (except for \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0	n/a ore timely provide calibration Final Date it 2007 is the date the been resolved one-time avoided o \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$94 allibration gas s the date the a Respondent sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work work work work work work work wor	\$94  with supplier to m due, and the ca November 19 the supplier had tem (except for \$0 \$0 \$0 \$0 \$0 \$0	n/a ore timely provide ca libration Final Date is 2007 is the date the been resolved, from one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0	\$94 alibration gas s the date the e Respondent costs) s0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  AVOIDED GOSTS  Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated ( (\$1,000), T Responden	costs to calibrate fla he Date Required is t reported the calibr reported that	res (\$1,000) and the date calibrat atlons had been c calibration gas is	1.9 to work were completed sues with ntering 1 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0	\$94  //th supplier to me due, and the call. November 19  the supplier had tem (except for \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0	n/a ore timely provide calibration Final Date it 2007 is the date the been resolved one-time avoided o \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$94 allibration gas s the date the a Respondent sosts) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	27-Mar-2007	Docke	<b>t No.</b> 2007-0493-AIR-E	PCW
	Equistar Chemicals, LP			Policy Revision 2 (September 2002)
Case ID No.				PCW Revision March 19, 2007
Reg. Ent. Reference No. Media [Statute]				
Enf. Coordinator				
Violation Number	8			
Rule Cite(s)	40 CFR § 63.10(d)(5)(i	i), 30 Tex. Admin. Code Code § 382.0	§ 101.20(2), and Tex. Health & 85(b)	Safety
Violation Description	stripper (EUTT8802). \$2006, the Respondent re 7, 2006, seven stripper of to state the cause of the state th	Specifically, in its report in eported that, on June 25, column malfunctions occurs occurs and faile he malfunctions and faile	ction reporting for the wastewar for the period April 1 to Septem 2006, and between July 17 an surred. However, the Responde ed to state what actions were tan envestigation conducted on Jan	nber 30, Id August ent failed aken to
			Base	Penalty \$10,000
>> Environmental, Property a	and Human Health M	latrix		
Release	Harm Major Madarata	Minar		
OR Actual		Minor		
Potential			Percent 0%	
>>Programmatic Matrix				
Falsification	Major Moderate	e Minor		
		X	Percent 1%	
				· · · · · · · · · · · · · · · · · · ·
Matrix Notes	Equistar failed t	to comply with less than	30% of the rule.	
			Adjustment	\$9,900
				\$100
Violation Events				<u> </u>
Violation Events				
	1	197.35.1	Number of violation days	3
mark only one	daily monthly quarterly		Violation Base	Penalty \$100
with an x	semiannual annual single event x		Violation Base	Tonaty \$100
	One single event is	s recommended for the c	one deficient report.	
Economic Benefit (EB) for th	is violation		Statutory Limit Tes	t
Estimated	d EB Amount	\$117	Violation Final Pena	Ity Total \$436
	<b>)</b>			
	eres (il	inis violation Final A	ssessed Penalty (adjusted fo	or limits) \$436

		conomic E	Jellellt 11	וכאוטו	neet	7.1	
	. Equistar Chemi	icals, LP				* * * * * * * * * * * * * * * * * * *	11 - 사망하다 -
Case ID No							the section of
Reg. Ent. Reference No							Years of
Media	88					Percent Interest	Depreciation
Violation No	. 8						7
						5.0	.l
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	1 No commas or \$						
			4.1				227224270000000000000000000000000000000
Delayed Costs				_			
Equipment	*	32 33 34 37 37 37 37 37 37 37 37 37 37 37 37 37	1000	0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)		5.555		0.0	\$0	\$0	\$0
Engineering/construction		9.00		0.0	\$0	\$0	\$0 \$0
Land	No. 22 Discussion			0.0	\$0 \$117	n/a n/a	\$117
Record Keeping System	\$2,000	30-Oct-2006	1-Jan-2008	1,2	\$117 \$0	n/a	\$0
Training/Sampling	General and Base (IN) and	(85.0500) (10.0500)	SSPECTO A ROBERT CHAIL C				\$0
	Commence of the Commence of th	A PARTICIPATION OF THE PARTICI	New restaurant contributions are selected				
Remediation/Disposal	C. S. C. Bandini II.			0.0	\$0 \$0		
	Estimated cos	ts to Improve report	ing procedures a	0,0 0.0	\$0 \$0 e and submit a c	n/a n/a orrected report. Th	\$0 \$0 ne Date Required
Remediation/Disposal Permit Costs	is the date	its to Improve report the deficient report leted improvements	was due, and the	0,0 0,0 and prepare Final Dat	\$0 \$0 e and submit a c e is the date the	n/a n/a orrected report. Th Respondent is exp	\$0 \$0 ne Date Required sected to have
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	is the date compl	the deficient report leted improvements	was due, and the to its record kee	0.0 0.0 and prepare Final Dat plng syste	\$0 \$0 e and submit a c e is the date the m and to have si	n/a n/a orrected report. Th Respondent is exp ubmitted a correcte	\$0 \$0 ne Date Required ected to have ad report.
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs  Avoided Cost	is the date compl	the deficient report	was due, and the to its record kee	0,0 0,0 and prepare Final Dat ping syste	\$0 \$0 e and submit a c e is the date the m and to have si tem (except for	n/a n/a orrected report. Th Respondent is exp ubmitted a correcte one-time avoided	\$0 \$0 ne Date Required sected to have ad report.
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost Disposal	is the date compl	the deficient report leted improvements	was due, and the to its record kee	0.0 0.0 ond prepare Final Dat ping syste	\$0. \$0 e and submit a c e is the date the m and to have si tem (except for \$0	n/a n/a orrected report. Th Respondent is exp ubmitted a corrected one-time avoided \$0	\$0 \$0 ne Date Required ected to have id report.
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost Disposal Personnel	is the date compl	the deficient report leted improvements IUALIZE [1] avoide	was due, and the to its record kee	0,0 0,0 and prepare Final Dat ping syste	\$0 \$0 e and submit a c e is the date the m and to have si tem (except for \$0 \$0	n/a n/a orrected report. Th Respondent is exp ubmitted a correcte one-time avoided \$0	\$0 \$0 ne Date Required sected to have ad report.
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIGED COST Disposal Personnel Inspection/Reporting/Sampling	is the date compl	the deficient report leted improvements	was due, and the to its record kee	0.0 0.0 or Final Dat ping syste entering It	\$0. \$0 e and submit a c e is the date the m and to have si tem (except for \$0	n/a n/a orrected report. The Respondent is expubriitted a corrected cone-time avoided \$0, \$0.	\$0 \$0 the Date Required ected to have discrete.
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	is the date compl	the deficient report leted improvements IUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 ond prepare serior system of the control of	\$0 \$0 e and submit a c e is the date the m and to have si tem (except for \$0 \$0	n/a n/a orrected report. The Respondent is expubriitted a corrected sone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 the Date Required the pected to have ad report. Costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs  AVOIDED COST Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	is the date compl	the deficient report leted improvements IUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 ond prepare Final Dat ping system of the pi	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubrilited a corrected cone-time avoided \$0.00000000000000000000000000000000000	\$0 \$0 the Date Required the point the second report. costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	is the date compl	the deficient report leted improvements IUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 ond prepare of Final Date ping system of the ping system of th	\$0 \$0 e and submit a c e is the date the m and to have si tem (except for \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubriitted a corrected sone-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 the Date Required the pected to have ad report. Costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIGE COST Disposal Personnel Inspection/Reporting/Sampling Supples/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	is the date complete and the complete an	the deficient report eted improvements iUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubrilited a corrected cone-time avoided \$0.00000000000000000000000000000000000	\$0 \$0 the Date Required the port. costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COST Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	is the date complete and the complete an	the deficient report leted improvements IUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubrilited a corrected cone-time avoided \$0.00000000000000000000000000000000000	\$0 \$0 the Date Required the port. costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COST Disposal Personnel Inspection/Reporting/Sampling Suppiles/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	is the date complete and the complete an	the deficient report eted improvements iUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubrilited a corrected cone-time avoided \$0.00000000000000000000000000000000000	\$0 \$0 the Date Required the port. costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COST Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	is the date complete and the complete an	the deficient report eted improvements iUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubrilited a corrected cone-time avoided \$0.00000000000000000000000000000000000	\$0 \$0 the Date Required the port. costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  AVOIDED COST Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	is the date complete and the complete an	the deficient report eted improvements iUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. The Respondent is expubrilited a corrected cone-time avoided \$0.00000000000000000000000000000000000	\$0 \$0 the Date Required the port. costs) \$0 \$0 \$0 \$0 \$0
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Cost Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	is the date complete and the complete an	the deficient report eted improvements iUALIZE [1] avoide	was due, and the to its record kee	0.0 0.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0 o.0	\$0. \$0 e and submit a ce is the date the m and to have si tem (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a orrected report. Tr Respondent is exp ubmitted a correcte one-time avoided \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 the Date Required the point sected to have ad report. costs) \$0 \$0 \$0 \$0 \$0

Screening Dat		Docke	No. 2007-0493-AIR-E	PCW
Responder Case ID No	t Equistar Chemicals, LP			Policy Revision 2 (September 2002)
Reg. Ent. Reference No			* .	PCW Revision March 19, 2007
Media [Statute	] Air			
Enf. Coordinato				***************************************
Violation Numbe Rule Cite(s				
Kule Cite(s	8.E., 30 Tex. Admin. 122.143(4), 40 CFR §§ 6	Code §§ 101.20(1), 101 0.482-6(á)(2) and 63.16 § 382.085(t	<u>.</u>	), and fety Code
Violation Description	ended lines: one on the eight others on lines in ha 15, 2005, February 13, 2	ndent reported that it fou e main flare header, thre exardous air pollutant se 006, and August 27, 20	lind flange, plug, or a second nd the following noncomplian se on other lines in VOC servicus. These were found on No6, respectively, and all were as documented during an involve, 29, 2007.	d, open- ce, and lovember
			Base	Penalty \$10,000
>> Environmental, Property		ıtrix		***************************************
Release	The state of the s	Minor		and the second s
OR Actua Potentia		X	_	***************************************
i otentia			Percent 25%	***************************************
>>Programmatic Matrix				***************************************
Falsification	Major Moderate	Minor	Barrant 00/	direction of the second
		<u></u>	Percent 0%	***************************************
Matrix Human hea	llth or the environment were	e exposed to insignifican	t amounts of pollutants not ex	cooding
Notes levels	protective of human health	or environmental recept	ors as a result of the violation	s.
<u>L</u>				
			Adjustment	\$7,500
				\$2,500
Violation Events				
N		n r		
Number of Vic	lation Events 2	3	Number of violation days	
	daily			
	monthly			
mark only one with an x	quarterly <u>x</u> semiannual		Violation Base	Penalty \$5,000
	annual			
	single event			***************************************
	Two quart	erly events are recomme	ended.	A CANADA
				***************************************
conomic Benefit (EB) for thi	s violation	100	Statutory Limit Test	
Estimated	EB Amount	\$70	7.000	
			Violation Final Penal	
		this violation Final Ass	essed Penalty (adjusted for	limits) \$21,819

	E	conomic B	enefit W	orksl	heet		
Respondent i	Equistar Chemi	cals, LP				a e	34.
Case ID No. 3	33070					The second second	a week
Reg. Ent. Reference No. I	RN100542281						Years of
Media						Percent Interest	Depreciation
Violation No.	9			2000 TO SERVER			
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Helli Desampher.			•		1.		
Delayed Costs						-	
Equipment				0.0	\$0	\$0	\$0
Bulldings				0.0	\$0	\$0	\$0 ************************************
Other (as needed)	\$1,000	15-Nov-2005	14-Nov-2006	1,0	\$3	\$66	\$70 \$0
Engineering/construction			2000	0.0	\$0	\$0 b/e	\$0 \$0
Land	., V. (±. 10, 2, 2, 8, 6)	3.65	\$3500 E.S. (1995)	0,0	\$0	n/a n/a	\$0 \$0
Record Keeping System			10 July 10 Jul	0.0	\$0 \$0	n/a	\$0
Training/Sampling		2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		0.0	\$0 \$0	n/a	\$0
Remediation/Disposal				×0.0	\$0 \$0	n/a	\$0
Permit Costs Other (as needed)	199			0.0	\$0 	n/a	\$0
Notes for DELAYED costs	first repor provided a	osts to cap open-end ted discovery of open dditional personnel	n ended lines, an training on the rec	d the Fin Julatory r	requirements of o	pen-ended lines in \	OC service.
Avoided Costs	ANI	NUALIZE [1] avoide	d costs before e	ntering	item (except for	one-time avoided	costs)
Disposal				0,0	\$0	1 50	, <b>\$</b> U
Personnel				0,0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0,0	\$0	\$0 \$0	\$0 \$0
Supplies/equipment			16	0,0	\$0	\$0 \$0	\$0
Financial Assurance [2]				0.0	\$0 \$0	\$0 \$0	\$0
ONE-TIME avoided costs [3]	0.75			0.0	\$0	\$0	\$0
Other (as needed)	A. C.		A STATE OF THE STA	<u> </u>	μφυ		
Notes for AVOIDED costs		The Artist Artist					
	The state of the s						

## **Compliance History**

Customer/Respondent/Owner-Operator:	CN600124705	Equistar Chemicals, LP	Classification: AVERAGE	Rating: 3.00
Regulated Entity:	RN100542281	CHANNELVIEW COMPLEX		Site Rating: 2.25
ID Number(s):				One reading. 2.20
To Hamber(5).	AIR OPERATING AIR OPERATING		ACCOUNT NUMBER	HG0033B
	AIR OPERATING		PERMIT	1426
<i>k</i>			PERMIT	2174
	AIR OPERATING		PERMIT	2175
	AIR OPERATING		PERMIT	2176
	AIR OPERATING AIR OPERATING		PERMIT	2177
			PERMIT	2178
	AIR OPERATING		PERMIT	2179
	AIR OPERATING		PERMIT	2180
	AIR OPERATING	· · · · · · · -	PERMIT	2181
	AIR OPERATING		PERMIT	2182
	AIR OPERATING		PERMIT	2183
	AIR OPERATING		PERMIT	2184
•	WASTEWATER	TERMITS	PERMIT PERMIT	2185
	WASTEWATER		PERMIT	WQ0000391000
	WASTEWATER		PERMIT	TPDES0003531
	AIR NEW SOUR	CE DEDMITS	PERMIT	TX0003531
	AIR NEW SOUR		PERMIT	1768
	AIR NEW SOUR			2128
	AIR NEW SOUR		PERMIT PERMIT	2933
•	AIR NEW SOUR			2935
	AIR NEW SOUR		PERMIT PERMIT	2936
	AIR NEW SOUR		PERMIT	3130A
	AIR NEW SOUR		PERMIT	3294
	AIR NEW SOUR		PERMIT	3627
	AIR NEW SOUR		PERMIT	6245
	AIR NEW SOUR		PERMIT	6387
	AIR NEW SOUR		PERMIT	8123
	AIR NEW SOUR		PERMIT	8125 10586
	AIR NEW SOUR		PERMIT	10700
	AIR NEW SOURC		PERMIT	10700
	AIR NEW SOURC		PERMIT	11735
	AIR NEW SOURC		PERMIT	12334
	AIR NEW SOURC		PERMIT	13849
	AIR NEW SOURC		PERMIT	15348
	AIR NEW SOURC	CE PERMITS	PERMIT	12341
	AIR NEW SOURC	CE PERMITS	PERMIT	22779
	AIR NEW SOURC	CE PERMITS	PERMIT	23079
	AIR NEW SOURC	E PERMITS	PERMIT	24677
	AIR NEW SOURC	CE PERMITS	PERMIT	24887
	AIR NEW SOURC	E PERMITS	PERMIT	30868
•	AIR NEW SOURCE	E PERMITS	PERMIT	32324
	AIR NEW SOURC	E PERMITS	PERMIT	32136
	AIR NEW SOURC	E PERMITS	PERMIT	32629
	AIR NEW SOURC	E PERMITS	PERMIT	33899
	AIR NEW SOURC		PERMIT	34036
•	AIR NEW SOURC	E PERMITS	PERMIT	34897
	AIR NEW SOURC		PERMIT	38750
	AIR NEW SOURC		PERMIT	42948
	AIR NEW SOURC		PERMIT	43770
	AIR NEW SOURC		PERMIT	45332
	AIR NEW SOURC		PERMIT	46417
	AIR NEW SOURC	····· =	PERMIT	47326
	AIR NEW SOURC		PERMIT	47487
	AIR NEW SOURC		PERMIT	50141
	AIR NEW SOURC		PERMIT	50142
	AIR NEW SOURC		PERMIT	50165
	AIR NEW SOURC		PERMIT	50322
	AIR NEW SOURC		ACCOUNT NUMBER	HG0033B
	AIR NEW SOURC		PERMIT	50812
	AIR NEW SOURC	E PERMITS	PERMIT	52720
	AIR NEW SOURC		PERMIT	52726
	AIR NEW SOURC		PERMIT	54098
	AIR NEW SOURC		REGISTRATION	54602
	AIR NEW SOURC	E PERIVITIS	PERMIT	54801

AIR NEW SOURCE PERMITS	PERMIT	55104
AIR NEW SOURCE PERMITS	PERMIT	55669
	AFS NUM	4820100075
AIR NEW SOURCE PERMITS	REGISTRATION	56137
AIR NEW SOURCE PERMITS		PSDTX991
AIR NEW SOURCE PERMITS	PERMIT	70201
AIR NEW SOURCE PERMITS	PERMIT	
AIR NEW SOURCE PERMITS	REGISTRATION	70323
AIR NEW SOURCE PERMITS	PERMIT	49120
AIR NEW SOURCE PERMITS	PERMIT	49130
AIR NEW SOURCE PERMITS	REGISTRATION	76017
AIR NEW SOURCE PERMITS	REGISTRATION	75881
AIR NEW SOURCE PERMITS	REGISTRATION	76313
AIR NEW SOURCE PERMITS	REGISTRATION	76277
	PERMIT	71143
AIR NEW SOURCE PERMITS	PERMIT	70203
AIR NEW SOURCE PERMITS		54063
AIR NEW SOURCE PERMITS	PERMIT	51727
AIR NEW SOURCE PERMITS	PERMIT	
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AIR NEW SOURCE PERMITS	REGISTRATION	72713
AIR NEW SOURCE PERMITS	PERMIT	72755
AIR NEW SOURCE PERMITS	REGISTRATION	72948
AIR NEW SOURCE PERMITS	REGISTRATION	72946
AIR NEW SOURCE PERMITS	REGISTRATION	73859
	REGISTRATION	74051
AIR NEW SOURCE PERMITS	REGISTRATION	74110
AIR NEW SOURCE PERMITS	REGISTRATION	74162
AIR NEW SOURCE PERMITS		74181
AIR NEW SOURCE PERMITS	REGISTRATION	74366
AIR NEW SOURCE PERMITS	REGISTRATION	74374
AIR NEW SOURCE PERMITS	REGISTRATION	
AIR NEW SOURCE PERMITS	PERMIT	74385
AIR NEW SOURCE PERMITS	REGISTRATION	74416
AIR NEW SOURCE PERMITS	REGISTRATION	74563
AIR NEW SOURCE PERMITS	REGISTRATION	74944
AIR NEW SOURCE PERMITS	REGISTRATION	74949
AIR NEW SOURCE PERMITS	REGISTRATION	75322
	EPA ID	PSDTX993
AIR NEW SOURCE PERMITS	REGISTRATION	76651
AIR NEW SOURCE PERMITS	REGISTRATION	76666
AIR NEW SOURCE PERMITS		76693
AIR NEW SOURCE PERMITS	REGISTRATION	76778
AIR NEW SOURCE PERMITS	REGISTRATION	
AIR NEW SOURCE PERMITS	REGISTRATION	76791
AIR NEW SOURCE PERMITS	REGISTRATION	77318
AIR NEW SOURCE PERMITS	REGISTRATION	77619
AIR NEW SOURCE PERMITS	REGISTRATION	77640
AIR NEW SOURCE PERMITS	REGISTRATION	77631
AIR NEW SOURCE PERMITS	REGISTRATION	78024
AIR NEW SOURCE PERMITS	REGISTRATION	78069
AIR NEW SOURCE PERMITS	REGISTRATION	78108
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AIR NEW SOURCE PERMITS		78173
AIR NEW SOURCE PERMITS		78191
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AIR NEW SOURCE PERMITS	REGISTRATION	78252
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7 111 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	REGISTRATION	78278
AIR NEW SOURCE PERMITS	REGISTRATION	78343
AIR NEW SOURCE PERMITS	REGISTRATION	78381
AIR NEW SOURCE PERMITS	REGISTRATION	78560
AIR NEW SOURCE PERMITS	REGISTRATION	78772
AIR NEW SOURCE PERMITS	REGISTRATION	78819
AIR NEW SOURCE PERMITS	REGISTRATION	78978
AIR NEW SOURCE PERMITS	REGISTRATION	78599
AIR NEW SOURCE PERMITS	PERMIT	72756
AIR NEW SOURCE PERMITS	REGISTRATION	79261
AIR NEW SOURCE PERMITS		79431
AIR NEW SOURCE PERMITS	REGISTRATION	79460
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/ III ( ILL II COCITOLE I LI IIII)	REGISTRATION	
AIL MEN COOLOC L FLAMILO	REGISTRATION	79712
AIR NEW SOURCE PERMITS	REGISTRATION	79892
AIR NEW SOURCE PERMITS	REGISTRATION	79938
AIR NEW SOURCE PERMITS	REGISTRATION	80296
AIR NEW SOURCE PERMITS	REGISTRATION	80137
AIR NEW SOURCE PERMITS	REGISTRATION	80449
AIR NEW SOURCE PERMITS	REGISTRATION	80597
	REGISTRATION	80689
AIR NEW SOURCE PERMITS	REGISTRATION	90014
AIR NEW SOURCE PERMITS	REGIOTATION	80914 2

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INDUSTRIAL AND HAZARDOUS WASTE GENERATION

INDUSTRIAL AND HAZARDOUS WASTE **GENERATION** 

INDUSTRIAL AND HAZARDOUS WASTE STORAGE

INDUSTRIAL AND HAZARDOUS WASTE

STORAGE

UNDERGROUND INJECTION CONTROL PUBLIC WATER SYSTEM/SUPPLY

WATER LICENSING IHW CORRECTIVE ACTION SOLID WASTE REGISTRATION # PERMIT

(SWR)

**PERMIT** 50117

PERMIT WDW036 REGISTRATION 1011578 LICENSE 1011578 SOLID WASTE REGISTRATION # 30030

(SWR)

8280 SHELDON RD BLDG 1, CHANNELVIEW, TX, 77530

Rating Date: September 01 06 Repeat Violator: NO

81190

81189

81543

30030

50117

TXD058275769

TCEQ Region:

Location:

REGION 12 - HOUSTON

Date Compliance History Prepared:

April 11 2007

Agency Decision Requiring Compliance History:

Enforcement

Compliance Period:

April 11, 2002 to April 11, 2007

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name:

Terry Murphy

Phone:

(512) 239-5025

## **Site Compliance History Components**

1. Has the site been in existence and/or operation for the full five year compliance period? Yes

2. Has there been a (known) change in ownership of the site during the compliance period? No

3. If Yes, who is the current owner?

N/A

4. if Yes, who was/were the prior owner(s)? 5. When did the change(s) in ownership occur?

N/A N/A

## Components (Multimedia) for the Site:

Final Enforcement Orders, court judgements, and consent decrees of the state of Texas and the federal government.

Effective Date: 11/02/2002

ADMINORDER 2001-1516-AIR-E (1660)

Classification: Moderate

Citation:

40 CFR Part 61, Subpart FF 61.342(c)(1)(ii) 40 CFR Part 61, Subpart FF 61.343(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to prevent unauthorized emissions as a result of a spill from a permitted tank. ADMINORDER 1999-1410-AIR-E (1660)

Effective Date: 04/13/2003

Classification: Moderate Citation:

30 TAC Chapter 115, SubChapter B 115.112(a)(1)

5C THC Chapter 382, SubChapter A 382,085(b)

Description: Failed to have the required vapor recovery system or submerged fill pipe at the time of inspection on

Tank No. 6901 in VOC service.

Classification: Moderate

30 TAC Chapter 115, SubChapter C 115.216(4)(B)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to keep copies of each marine vessel's certification of annual vapor tightness tests for marine

loading operations at the Plant.

Classification: Moderate

30 TAC Chapter 115, SubChapter D 115.356(1)(F)

30 TAC Chapter 115, SubChapter D 115.356(3)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to maintain calibration records for VOC monitoring instruments for two years. Calibration records from the first, second and fourth quarters of 1997 and the first quarter of 1998 were unavailable.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(2)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT W 61.275(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit results of seal inspections for Tanks 3111A, 3111B, 3113 and 4916 w/i 60 days after

Equistar completed the seal inspections on April 21 thru April 27, 1998.

Classification: Moderate

Citation:

30 TAC Chapter 101, SubChapter A 101.20(1) 40 CFR Part 60, Subpart Kb 60.115b(b)(2) 5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit a seal inspection report for Tank No. 4922 and Tank No. 33 within 60 days of

inspection.

Classification: Moderate

30 TAC Chapter 115, SubChapter D 115.354(2)[G] 30 TAC Chapter 115, SubChapter D 115,355(1)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-2(a) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-7(f) 40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.245(b)

40 CFR Part 60, Subpart VV 60.482-2[G] 40 CFR Part 60, Subpart VV 60.482-7[G] 40 CFR Part 61, Subpart V 61.242-7(a) 40 CFR Part 61, Subpart V 61.245(a)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to properly monitor fugitive emissions for several units, including the Olefins Plant I and Tank Farm, Olefins Plant II and Tank Farm, Butadiene Plants E and W, Barge Dock, Benzene/Toluene Unit, East Tank

Farm, LMTBE Unit and the MeOH Unit.

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter B 115.114(a)(2)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to perform seal gap measurements on Tanks TK-26, TK-3115, TK-3112, and TK-4921 on an

annual basis in 1998. Classification: Moderate

Citation:

5C THC Chapter 382, SubChapter A 382.0518[G]

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit notification as requird by Standard Exemption 106 (effective August 25, 1986) when

the 1200 Unit was modified to produce a new product.

Effective Date: 12/02/2006

ADMINORDER 2006-0515-AIR-E (findings)

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: S.C. 1 PERMIT

Description: Failure to prevent the release of unauthorized emissions from an aboveground storage tank pressure

safety valve.

Any criminal convictions of the state of Texas and the federal government, B.

C. Chronic excessive emissions events.

N/A

The approval dates of investigations. (CCEDS Inv. Track. No.) D

1	04/22/2002	(156273)	111	08/31/2003	(134179)		223	04/06/2005	(375076)
_	0.1.100/0000	(1339)		08/31/2003	(134175)		224	04/18/2005	(375016)
2	05/22/2002	(1009)	113	10/01/2003	(249301)		225	04/20/2005	(376147)
•	05/22/2002	(1314)	114	10/01/2003	(249144)	Land Control of the Control	226	04/20/2005	(372583)
		(156277)	115	10/01/2003	(249012)		227	04/22/2005	(346277)
4	05/23/2002	•	116	10/01/2003	(249172)		228	04/25/2005	(377509)
•	06/05/2002	(2105)	117	10/01/2003	(248879)		229	05/03/2005	(419501)
6	06/10/2002	(2233)	118	10/01/2003	(248981)		230	05/24/2005	(419502)
7	06/12/2002	(1611)	119	10/01/2003	(248243)		231	06/14/2005	(393497)
8	06/24/2002	(2701)	120	10/03/2003	(249082)		232	06/21/2005	(419503)
9	06/24/2002	(156281)	121	10/07/2003	(250145)		233	06/22/2005	(381407)
10	06/24/2002	(2914)	122	10/17/2003	(294653)		234	06/22/2005	(392621)
11	07/19/2002	(5534)	123	10/23/2003	(294655)		235	06/23/2005	(378466)
12	07/19/2002	(5345)	123	11/05/2003	(254238)		236	06/23/2005	(378454)
13	07/19/2002	(4814)		11/18/2003	(294656)		237	07/15/2005	(395098)
14	07/19/2002	(4569)	125	12/29/2003	(294657)		238	07/18/2005	(392902)
15	07/23/2002	(156285)	126		(294658)		239	07/22/2005	(392487)
16	07/31/2002	(5089)	127	01/23/2004	(294639)		240	07/22/2005	(381313)
17	08/01/2002	(4981)	128	02/24/2004	(255945)		241	07/22/2005	(392651)
18	08/02/2002	(6606)	129	03/15/2004	,			07/22/2005	(394428)
19	08/06/2002	(7028)	130	03/22/2004	(294642)		243	07/25/2005	(440656)
20	08/06/2002	(7144)	131	03/23/2004	(263250)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	244	07/26/2005	(399215)
21	08/06/2002	(7204)	132	03/23/2004	(263160)		245	08/05/2005	(381400)
22	08/06/2002	(7234)	133	03/23/2004	(263194)	$\mathcal{A}_{ij}(x) = \mathcal{A}_{ij}(x) + \mathcal{A}_{ij}(x)$	246	08/05/2005	(392610)
23	08/07/2002	(7141)	134	03/23/2004	(263154)	recording to the second	247	08/05/2005	(393207)
24	08/08/2002	(2391)	135	03/24/2004	(256278)		111111	08/11/2005	(404370)
25	08/09/2002	(2626)	136	04/14/2004	(264758)	end of the state of	248	08/11/2005	(404370)
26	08/09/2002	(7549)	137	04/15/2004	(453160)	11 - 1 - 1 - 1 - 1	249	*** ** ***	(404342)
27	08/09/2002	(4157)	138	04/23/2004	(294643)	and the second of the second	250	08/11/2005	(404042)

28	08/09/2002	(5980)	139	05/19/2004	(270464)	251	08/11/2005	(404321)
		•			,			
29	08/09/2002	(2387)	140	05/24/2004	(294645)	252	08/12/2005	(399221)
30	08/12/2002	(6957)	141	06/08/2004	(270126)		08/15/2005	(404957)
31	08/13/2002	(7700)	142	06/21/2004	(294647)	254	08/23/2005	(440657)
32	08/16/2002	(5841)	143	06/30/2004	(273943)	255	08/24/2005	(406415)
33	08/19/2002	(8124)	144		(271411)	256	08/26/2005	(372787)
34	08/21/2002	(156288)	145	06/30/2004	(274359)	257	08/29/2005	(406161)
35	08/22/2002	(5939)	146	06/30/2004	(274423)	258	09/13/2005	(431694)
36	08/22/2002	(5772)	147	07/09/2004	(278834)	259	10/24/2005	(440658)
37	08/27/2002	(7197)	148	07/13/2004	(260492)	260	10/26/2005	(440659)
38	08/28/2002	(8742)	149	07/19/2004	(260586)	261	11/15/2005	(434603)
39	08/30/2002	(10526)	150	07/25/2004	(351828)	262	11/18/2005	(437299)
40	08/30/2002	(10522)	151	07/29/2004	(263469)	263	11/22/2005	(468155)
41	09/04/2002	(8299)	152	08/04/2004	(280108)	264	11/28/2005	(468154)
42	09/10/2002	(10385)	153	08/04/2004	(280174)	265	12/01/2005	(435325)
43	09/18/2002	(11434)	154	08/11/2004	(284585)	266	12/08/2005	(434728)
44	09/23/2002	(156291)	155	08/13/2004	(277268)	267	12/19/2005	(438915)
45	10/21/2002	(156294)	156	08/23/2004	(259476)	268	12/21/2005	(468156)
46	11/25/2002	(156298)	157	08/24/2004	(351829)	269	02/15/2006	(455481)
47	11/27/2002	(14344)	158	08/27/2004	(265746)	270	02/22/2006	(450109)
48	12/19/2002	(156302)	159	08/27/2004	(269133)	271	02/24/2006	(451477)
49	12/27/2002	(15704)	160	08/27/2004	(265803)		02/27/2006	(468153)
50	12/30/2002	(17670)	161	08/27/2004	(266244)	273	02/28/2006	(451452)
51	01/02/2003	(18051)		08/29/2004	(268291)	274	02/28/2006	(451480)
52	01/09/2003	(16679)	163	08/31/2004	(276264)	275	02/28/2006	(451788)
53	01/21/2003	(156306)	164	08/31/2004	(271963)	276	02/28/2006	(451483)
54	01/30/2003	(23340)	165	08/31/2004	(272796)	277	02/28/2006	(451494)
	02/05/2003		166	08/31/2004	(274451)	278	03/13/2006	(454890)
55 56		(23369)				279		
56	02/24/2003	(4858)	167	09/01/2004	(286398)		03/23/2006 03/24/2006	(498017)
57	02/24/2003	(156266)	168	09/01/2004	(289083)	280		(457373)
58	02/26/2003	(20471)	169	09/01/2004	(289240)	281	03/28/2006	(453139)
59	03/07/2003	(20710)	170	09/10/2004	(273388)		03/29/2006	(459500)
60	03/07/2003	(9862)	171	09/16/2004	(263553)		03/31/2006	(455940)
61	03/18/2003	(20944)	172	09/23/2004	(351830)	284	04/24/2006	(498018)
62	03/24/2003	(156269)	173	10/25/2004	(351831)	285	04/28/2006	(462755)
63	04/11/2003	(24878)	174	10/25/2004	(351833)	286	05/16/2006	(463873)
64	04/11/2003	(24871)	175	11/01/2004	(285942)	287	05/23/2006	(498019)
65	04/11/2003	(24868)	176	11/03/2004	(334297)	288	05/23/2006	(466508)
66	04/13/2003	(31335)	177	11/05/2004	(334314)	289	05/24/2006	(465260)
67	04/22/2003	(156274)	178	11/05/2004	(334310)	290	05/31/2006	(480441)
68	04/23/2003	(33871)	179	11/05/2004	(334308)	291	05/31/2006	(480422)
69	04/25/2003	(33319)	180	11/11/2004	(292333)	292	05/31/2006	(480433)
70	04/25/2003	(28077)	181	11/11/2004	(292452)	293	05/31/2006	(480405)
71	05/07/2003	(27054)	182	11/14/2004	(275792)	294	05/31/2006	(480427)
72	05/08/2003	(35681)	183	11/22/2004	(293289)	295	05/31/2006	(480444)
73	05/15/2003	(282930)	184	11/22/2004	(339105)	296	06/21/2006	(498020)
74	05/19/2003	(36187)	185	11/22/2004	(339107)	297	06/26/2006	(464019)
75	05/23/2003	(156278)	186	11/23/2004	(334387)	298	06/30/2006	(483427)
76	06/13/2003	(38138)	187	11/23/2004	(351832)	299	07/07/2006	(484895)
77	06/18/2003	(38117)	188	11/23/2004	(334429)	300	07/17/2006	(464664)
78	06/24/2003	(156282)		11/29/2004	(274800)	301	07/17/2006	(460500)
79	06/27/2003	(114332)		12/06/2004	(275639)		07/19/2006	(480415)
80	07/08/2003	(114317)	191	12/06/2004	(341908)	303	07/20/2006	(486401)
81	07/08/2003	(114279)		12/09/2004	(343543)		07/24/2006	(520033)
82	07/08/2003	(114581)	193	12/14/2004	(339112)	305	07/28/2006	(484749)
83	07/08/2003	(114388)		12/15/2004	(339111)		08/04/2006	(339110)
84	07/11/2003	(38147)		12/27/2004	(381708)	307	08/15/2006	(482128)
85	07/11/2003	(112449)		12/27/2004	(276826)		08/15/2006	(481194)
86	07/23/2003	(294649)		12/28/2004	(343601)		08/15/2006	(489890)
87	08/04/2003	(64101)		01/03/2005	(286756)	310	08/16/2006	(457265)
88	08/06/2003	(147467)		01/03/2005	(339113)	311	08/21/2006	(520034)
89	08/06/2003	(147338)		01/04/2005	(339104)		09/01/2006	(510768)
90	08/12/2003	(148968)	201	01/05/2005	(339108)		09/05/2006	(486742)
91	08/12/2003	(148934)		01/07/2005	(339103)		09/25/2006	(520035)
92	08/12/2003	(112317)		01/10/2005	(343232)		10/04/2006	(488324)
93	08/12/2003	(148923)		01/12/2005	(346553)		10/24/2006	(544282)
94	08/14/2003	(149856)		01/18/2005	(336265)		11/21/2006	(516667)
95	08/14/2003	(149867)		02/10/2005	(349636)		11/27/2006	(544283)
95 96	08/14/2003	(141032)		02/10/2005	(349316)		11/30/2006	(531615)
97		(149824)		02/10/2005	(349111)		12/11/2006	(519152)
91	30/17/2000	(170027)	200	02,10,2000	(,			(0.02)
								!

98	08/19/2003	(149893)	209	02/10/2005	(337111)	321	12/19/2006	(544284)
99	08/19/2003	(149887)	210	02/10/2005	(349267)	322	12/29/2006	(535494)
100	08/19/2003	(149908)	211	02/11/2005	(336418)	323	01/23/2007	(544285)
101	08/22/2003	(149977)	212	02/11/2005	(336433)	324	01/30/2007	(538091)
102	08/25/2003	(149897)	213	02/11/2005	(336438)	325	01/31/2007	(537102)
103	08/25/2003	(294651)	214	02/17/2005	(343594)	326	01/31/2007	(517108)
104	08/25/2003	(151586)	215	02/23/2005	(381706)	327	01/31/2007	(537091)
105	08/25/2003	(151756)	216	02/25/2005	(345588)	328	01/31/2007	(537099)
106	08/25/2003	(151765)	217	03/03/2005	(339106)	329	02/08/2007	(538420)
107	08/27/2003	(152697)	218	03/22/2005	(381707)	330	02/22/2007	(485046)
108	08/27/2003	(13764)	219	03/28/2005	(375234)	331	02/27/2007	(532597)
109	08/29/2003	(152195)	220	03/28/2005	(375220)	332	03/21/2007	(532595)
110	08/29/2003	(152183)	221	03/28/2005	(375212)	333	04/05/2007	(532607)
			222	03/31/2005	(373125)	334	04/10/2007	(532608)

Moderate

Moderate

Written notices of violations (NOV). (CCEDS Inv. Track. No.) F

> (156285) Date: 06/30/2002

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 07/31/2002 (156288)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G] Failure to meet the limit for one or more permit parameter Description:

(156294)

Date: 09/30/2002

Classification: Moderate Self Report? YES

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

10/31/2002 (156298)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter

Description: Date: 01/27/2003 (15704)

Classification: Self Report?

30 TAC Chapter 101, SubChapter F 101.222(b)(2) Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)[G]

Failure to control emissions. Description:

Date: 01/31/2003 (156266)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305,125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 02/10/2003 (24871)

Classification: Self Report?

30 TAC Chapter 101, SubChapter F 101.222(b)(2) Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(1)

Failure to prevent unauthorized emissions. Description:

Date: 02/28/2003 (156269)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305,125(1) Citation: TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 03/07/2003

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter A 101.7(b)(1)(G) Citation: 30 TAC Chapter 101, SubChapter A 101.7(c)(7)

Failure to document the actions taken to minimize emissions in both the initial and final Description:

notification records for a start-up event on 02/16/2002.

Date: 03/31/2003 (156274)

Classification: Moderate Self Report?

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 04/11/2003 (24868)

Classification: Moderate Self Report?

30 TAC Chapter 101, SubChapter F 101.222(b)(3) Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(1) Description:

Failure to prevent unauthorized emissions.

Date: 04/30/2003

(156278)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1)

Citation: TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 05/31/2003 (156282)

Self Report?

Classification: Moderate

Classification:

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Moderate

Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 07/31/2003

Self Report? Citation:

30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G] Description: Failure to meet the limit for one or more permit parameter

Date: 08/31/2003

Classification:

Self Report? Citation:

30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 09/30/2003 (294655)

Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 10/01/2003 (248879)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Failure to comply with the MAERT limit for EPN: 44E10. Description:

Date: 10/01/2003 (248243)

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation:

Description: Failure to comply with the MAERT limit.

Date: 10/01/2003 (249082)

Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failure to torque the flange properly.

Date: 10/01/2003 (249144)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Failure to comply with the MAERT limit for EPN 17E01 Description:

Date: 10/01/2003 (249301)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Failure to comply with permit limit for VOC, CO and NO (EPN: 48E01). Description:

Date: 10/01/2003 (249012)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: Description: Failure to comply with the MAERT limit for EPN 6E07.

Date: 10/01/2003 (249172)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)[G] Description: Failure to submit the initial report within 24 hours.

Date: 10/01/2003 (248981)

Self Report? Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.116(a)(1)

5C THC Chapter 382, SubChapter A 382.085(b)

Failure to comply with the state rule 30 TAC 116.116(a)(1) which resulted in unauthorized emissions. Description:

Date: 02/29/2004 (294642)

Self Report? Classification: Moderate

30 TAC Chapter 305, SubChapter F 305.125(1) Citation: TWC Chapter 26 26.121(a)[G]

Description: Failure to meet the limit for one or more permit parameter

Date: 07/13/2004 (260492)

Ramt Prov:

Self Report? Classification: Moderate

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT TCEQ AIR PERMIT #1768, SC #1

Description: Exceeded VOC emissions limits during an avoidable emissions event. Date: 07/19/2004 (260586)

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.201(b)(4) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

Failed to identify the facility name in an emissions event notification. Description: Classification:

Self Report? Citation:

30 TAC Chapter 101, SubChapter F 101.201(g)

Equistar failed to submit an electronic final emissions event notification. Description:

Date: 07/28/2004 (259476)

Moderate Classification: Self Report?

Minor

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) 5C THC Chapter 382, SubChapter A 382.085(b)

Exceeded permit limits during an avoidable emissions event.

Description: (263553) Date: 08/11/2004

Classification: Moderate Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(G) Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(7) 5C THC Chapter 382, SubChapter A 382.085(b)

Failed to speciate VOC in the Initial Notification and Final Report submitted for an Description:

avoidable emissions event.

Date: 08/27/2004 (265746)

Classification: Minor Self Report?

30 TAC Chapter 101, SubChapter F 101.201(a)(2)(D) Citation:

30 TAC Chapter 101, SubChapter F 101.201(b)(4)

Equistar failed to properly complete and submit an emissions event notification. Description:

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Equistar exceeded permit limits during an avoidable emissions event. Description:

Date: 08/29/2004 (268291)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Equistar exceeded VOC permit limit. Description:

Date: 08/31/2004 (272796)

Classification: Minor Self Report?

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(H) 30 TAC Chapter 101, SubChapter F 101.201(b)(8)

5C THC Chapter 382, SubChapter A 382.085(b)

Failed to submit adminstratively complete emissions event notifications. Description:

08/31/2004 (271963)Date:

Moderate Classification: Self Report?

30 TAC Chapter 101, SubChapter F 101.211(a)(1)(F) Citation: 30 TAC Chapter 101, SubChapter F 101.211(b)(5)

30 TAC Chapter 116, SubChapter B 116.115(c)

Equistar was not in compliance with the maintenance, startup, and shutdown rules. Description:

Date: 10/31/2004 (351832)

Classification: Moderate Self Report?

30 TAC Chapter 305, SubChapter F 305.125(1) Citation:

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

Date: 12/27/2004 (276826)

Self Report?

Classification: Moderate 30 TAC Chapter 116, SubChapter B 116.115(b) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

PERMIT TCEQ Air Permit No. 2933, GC #8 Ramt Prov:

Exceeded permit limits during an avoidable emissions event. Description: (286756)

Date: 01/03/2005 Classification: Self Report?

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: **PERMIT 22779** 

Equistar failed to prevent an avoidable emissions event. Description:

Date: 01/04/2005 (339104)

Classification: Moderate Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G) Citation: 5C THC Chapter 382, SubChapter A 382.085(b)

Equistar failed to prevent an avoidable emissions event.

Description:

Date: 01/10/2005 (343232)

Classification: Minor Self Report?

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii) Citation:

Description:

Failure to provide an adequate ground storage capacity

Self Report?

NO

Classification:

Citation:

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v)

Description:

Failure to provide a minimum pressure tank capacity of 220 gallons.

04/20/2005 Date:

(372583)

Self Report?

30 TAC Chapter 101, SubChapter F 101.201(g)

Citation: Description:

NO

Equistar failed to submit the Final Report electronically

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PERMIT Permit No. 22779, Special Condition No.1 Equistar failed to prevent an avoidable emissions event.

Description: 08/05/2005 Date:

(381400)

Self Report?

Citation:

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description:

Failure to test within 60 days following installation of NOx control equipment on furnace

Date: 08/05/2005 (393207)

Self Report?

Citation:

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Description:

Failure to test within 60 days following installation of NOx control equipment on Furnace

Classification: Minor

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Minor

Minor

Moderate

Minor

Minor

Minor

Minor

Minor

Moderate

Minor

Minor

Minor

Minor

Minor

Moderate

NO Self Report?

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Description:

Failure to test within 60 days following installation of NOx control equipment on F4410.

Self Report?

NO

Classification:

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Description:

Failure to test within 60 days following installation of NOx control equipment on Furnace

Self Report? NO

30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Description:

Failure to test within 60 days following installation of NOx control equipment on Furnace

Date: 08/05/2005 (392610)

Self Report?

Classification: 30 TAC Chapter 117, SubChapter E 117.520(c)(2)(A)(ii)(II)

Citation: Description:

Failure to test within 60 days following installation of NOx control equipment on Furnace

Date: 08/10/2005 (404514)

Self Report?

30 TAC Chapter 116, SubChapter B 116.115(b)

Citation: Rqmt Prov:

5C THC Chapter 382, SubChapter A 382.085(b) PERMIT TCEQ Permit #2128, GC #8

Description:

Failure to prevent a leak in Tower T-301.

Date: 09/13/2005

(431694)

Self Report?

30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii)

Description:

Failure to provide an adequate ground storage capacity

Self Report?

Citation:

Citation: Description: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v) Failure to provide a minimum pressure tank capacity of 220 gallons.

Date: 11/18/2005

Self Report?

(437299)

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Rqmt Prov:

Citation:

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) PERMIT 3130A, SC No. 4

Description:

OP 002179, ST&C No. 10

Failure to operate within pumping rates of Polyols(KOH) and (IMPACT). Classification:

Self Report?

NO

30 TAC Chapter 117, SubChapter B 117.213(a)[G] Failure to install the totalizing fuel flow meter on EGBVC6904.

Description: 12/08/2005 Date:

(434728)

Self Report?

Description:

30 TAC Chapter 122, SubChapter C 122.222(k)(3)

Failure to submit the off-permit notification for claiming the permit by rule for flare

emissions Self Report?

Classification:

Citation: Description: 30 TAC Chapter 106, SubChapter K 106.261(a)(6)

Self Report? NO Failure to register the PBR within 10 of increase in flare emissions. Classification:

30 TAC Chapter 101, SubChapter A 101.20(1) Citation:

> 30 TAC Chapter 115, SubChapter D 115.352[G] 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a)

Rgmt Prov:

PERMIT 49130, S.C. No.5

OP O-02180, S.C No.1A

Description:

Failure to follow the fugitive monitoring for 172 valves and 5 pumps in the Isopropanol

NO Self Report?

30 TAC Chapter 115, SubChapter D 115.354(5)

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) OP O-02180, SC. 1.A

Ramt Prov: Description:

Failure to have required information on tags attached to visual fugitive leaks

Self Report? NO

30 TAC Chapter 101, SubChapter A 101.20(2) Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)

Rqmt Prov:

PERMIT 49130, SC 5.E OP O-02180, SC 1.A

Description:

Failure to cap or plug the five open-ended lines in VOC service

NO Self Report?

Classification: Moderate

Classification:

Classification:

Classification:

Minor

Moderate

Moderate

Moderate

Moderate

Moderate

Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rgmt Prov:

PERMIT 49130, S.C 7 OP O-02180, S.C-11

Description:

Failure to follow the procedure described in Appendix P, Section 5.5.1 for monitoring the

cooling tower (CT-2401) as required by the permit condition

Self Report? NO

30 TAC Chapter 122, SubChapter B 122.145(2)(A)

Citation:

Failure to report the deviations regarding the cooling tower monitoring in the deviation

reports (438915)

Date: 12/19/2005 Self Report?

Description:

Classification:

Citation:

30 TAC Chapter 122, SubChapter C 122.210(a)

Description:

Failure to submit the federal operating permit (0-02177) minor revision application concurrent with the permit amendment issued on July 26, 2005 and permit by rules

claimed in 1997 and 2002.

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov:

PERMIT 22779, SC 1 OP O-02177, STC 10

Description:

Failure to operate tanks and loading arms within maximum allowable emission rates as

permitted in the NSR permit 22779.

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) PERMIT 22779, SC 8

OP O-02177, STC 10

Ramt Prov: Description:

Failure to initiate the fugitive monitoring for 22 valves and 3 pumps in the Polybutadiene

Self Report?

Classification: Moderate

Classification:

Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

30 TAC Chapter 116, SubChapter B 116,115(c)

Rqmt Prov: PERMIT 22779, SC 8.E

OP O-02177, STC 10

Description:

Failure to cap or plug the five open-ended lines in VOC service

Date: 12/31/2005 (440659)

NO

Self Report?

Classification: Moderate 30 TAC Chapter 305, SubChapter F 305.125(1)

TWC Chapter 26 26.121(a)[G]

Failure to meet the limit for one or more permit parameter Description:

02/22/2006 (450109) Date:

Self Report?

Classification:

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4) Rqmt Prov:

**PERMIT 24887 SC1.E** OP 002176, SC 15

Failure to cap or plug the eighty five (85) open-ended lines in VOC service Description:

Classification: Self Report?

Citation:

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(4)

30 TAC Chapter 122, SubChapter C 122.222(k)(3)

Description:

Failure to register the PBRs 106.261 and 106.262 within 10 days of addition of a flare

analyzer and failure to make off-permit notification concurrently.

Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)(B)[G] Description Failure to represent the several sources that are subject to 30 TAC 111 rules in the Title V Operating Permit. Self Report? NΟ Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) Ramt Prov: PERMIT 24887, SC 1 OP 002176, SC 15 Failure to include 19 valves and 39 connectors associated with sample systems and Description: failure to include 5 pumps, 38 valves, 104 connectors, and 4 sample points in the fugitive monitoring database Self Report? Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter B 115.142[G] 30 TAC Chapter 122, SubChapter B 122,143(4) Rgmt Prov: OP 002176, SC 5 Description: Failure to control the wastewater streams as required by 30 TAC 115.142. Self Report? Classification: Minor Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.113b(b)(5) Rqmt Prov: OP 002176, SC 1 A Description: Failure to make the tank seal inspection notification 30 days in advance. Date: 02/28/2006 Self Report? Classification: Minor Citation: 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) Ramt Prov: PA NSR Permit No. 8125, SC 6E Description: Failure to plug two open-ended-lines. Self Report? NO Classification: Minor Citation: 30 TAC Chapter 117, SubChapter B 117.213(a) Description: Failure to install fuel flow meter on Diesel Engine, P-3314. Self Report? NO Classification: Minor 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d) Citation: Description: Failure to include compressor information in the HON Subpart H Semiannual report. Self Report? NO Classification: Minor 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181(a) Citation: Failure to maintain appropriate records of 220 connectors, 6 instrument systems, 4 Description: PSVs, 2 pumps, and 101 valves. Date: 03/24/2006 (457373)Self Report? Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(ii) Description: Failure to provide an adequate ground storage capacity Self Report? NO Classification: Minor Citation: 30 TAC Chapter 290, SubChapter D 290.45(d)(2)(B)(v) Failure to provide a minimum pressure tank capacity of 220 gallons. Description: Date: 03/28/2006 (453139) Self Report? Classification: Minor Citation: 30 TAC Chapter 115, SubChapter D 115.352(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1) 5C THC Chapter 382, SubChapter A 382.085(b) Rgmt Prov: PA NSR Permit No 2936, SC 10E OP O-02182 Special Terms and Condition 15 Description: Failed to plug 20 open-ended lines. Self Report? Classification: Minor Citation: 30 TAC Chapter 116, SubChapter B 116,110(a)(4) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter C 122.222(k)(2) 5C THC Chapter 382, SubChapter A 382.085(b) Rqmt Prov: OP 0-02181 General Terms and Condition Description: The facility failed to register two tanks and one cooling tower within ten (10) days of change as required during August 19, 2004 through November 22, 2004 Self Report? NO Classification: Minor Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182(d) 5C THC Chapter 382, SubChapter A 382.085(b) Rqmt Prov: OP O-02182 General Terms and Condition Description: Failure to include compressor information in the HON Subpart H semiannual report for

the reporting period from February 28, 2005 through August 19, 2005.

30 TAC Chapter 115, SubChapter D 115.354(2)(C) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

Classification:

Minor

Self Report?

Citation:

NO

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)

5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

PA Special Condition No. 10F OP Special Terms and Condition 15

Description:

failure to monitor 59 valves that were marked as unsafe to monitor during the third

quarter of 2004 form August 19, 2004 through September 30, 2004.

Self Report?

Citation:

NO

30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

OP General Terms and Condition

Description:

Citation:

failure to put identification number for the leaking fugitive valves during August 19, 2004

through August 19, 2005.

Self Report?

NO

30 TAC Chapter 115, SubChapter D 115.354 30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

OP Special Terms and Condition 15

failure to include 89 connectors, 27 valves, and 19 pumps in the fugitive monitoring Description:

program during the third quarter of 2004 form August 19, 2004 through September 30,

2004.

Self Report?

NO

Classification:

Minor

Minor

Minor

Classification:

Classification:

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(1)

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

OP General Terms and Condition

Description:

failure to obtain a permit by rule (PBR) for the emission point no. SP-4010. Minor

Classification:

NO Self Report? Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

**OP General Terms and Conditions** 

Description:

faiure to seal the external floating roof tank, TK-3112. The gasket on the rim vent was

missina.

Self Report?

Classification:

Moderate

Moderate

Citation:

Rgmt Prov:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter A 382.085(b)

PA SC No 1 of NSR Permit No. 2936.

OP Special Terms and Conditions 15

failure to obtain appropriate authorization for storing hydrocarbons for the tanks, TK-3113 Description:

and TK-3114.

NO

Self Report? NO

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov:

Citation:

PA Special Condition 1

OP Special Terms and Condition 15

Description:

failure to comply with the pounds per hour of VOC emission limit for tank No. TK-4002 of

TCEQ Air Permit 2936.

Self Report? NO

Classification:

Classification:

Classification:

Minor

Minor

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(1) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Description: **OP General Terms and Conditions** failure to obtain a permit by rule (PBR) for the analyzer vent.

NO Self Report?

30 TAC Chapter 122, SubChapter B 122.132(a)

Citation:

5C THC Chapter 382, SubChapter A 382.085(b)

Description:

Failure to include all the emission authorizations for the cooling tower were not

represented in the title V permit.

Date: 03/29/2006

(459500)

(455940)

Classification:

Moderate

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

5C THC Chapter 382, SubChapter A 382.085(b)

Rgmt Prov:

PERMIT TCEQ Permit No. 2128

Description:

Failure to prevent the release of unauthorized emissions from a railroad tank car PSV.

Self Report?

Date: 03/31/2006

Classification:

Minor

Citation:

NO

30 TAC Chapter 122, SubChapter B 122.142(b)(2)[G]

5C THC Chapter 382, SubChapter D 382.085(b) Failure to represent the two sources that are subject to 30 TAC 111 rules in the Title V

Description: Operating Permit O-02175.

Self Report? NO Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov: PERMIT 6245, SC 1 OP 002175, STC 10 Description: Failure to operate tanks (TK30 & TK31) within maximum allowable emission rates as permitted in the NSR permit 6245. Self Report? Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1) 5C THC Chapter 382, SubChapter D 382.085(b) PERMIT 6245, SC 7.E Rqmt Prov: OP 002175, STC 10 OP 002175, STC 1A Description: Failure to cap or plug the thirty-eight (38) open-ended lines in VOC service (C5 recovery unit). NO Self Report? Classification: Minor 30 TAC Chapter 101, SubChapter A 101.20(1) Citation: 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-5(a) 5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov: OP 002175, STC 1A Description: Failure to equip the dimer drum feed sampling connection system with closed loop. Self Report? Classification: Minor Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.486(b)(1) 5C THC Chapter 382, SubChapter D 382.085(b) OP 002175, STC 1A Rqmt Prov: Description: Failure to have required information on tags attached to visual fugitive leaks Self Report? NO Classification: Citation: 30 TAC Chapter 101, SubChapter A 101.20(1) 30 TAC Chapter 115, SubChapter D 115.352[G] 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-1(a) 5C THC Chapter 382, SubChapter D 382.085(b) PERMIT 6245, SC 7 Rqmt Prov: OP 002175, STC 10 OP 002175, STC 1A Description: Failure to include 2 pumps, 32 valves, and 103 connectors in the C5 recovery unit in fugitive monitoring database. Date: 05/16/2006 (463873). Self Report? Classification: Moderate Citation: 30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b) Rgmt Prov: PERMIT TCEQ Permit No. 2128 Description: Failure to prevent the release of unauthorized emissions from a leaking pipeline due to the removal of a blind. Date: 05/24/2006 (465260)Self Report? Classification: Moderate Citation: 30 TAC Chapter 122, SubChapter B 122.142(b)(2)[G] 5C THC Chapter 382, SubChapter D 382.085(b) Description: Failure to correctly represent the HON storage vessel provisions, HON container provisions, and 30 TAC 111 rules in the Title V Operating Permit O-02185. NO Self Report? Classification: Moderate Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart G 63.119(c)(2)(ii) 5C THC Chapter 382, SubChapter D 382.085(b) Rqmt Prov: OP O-02185, STC 16 OP O-02185, STC 1A PERMIT Permit 6387, SC 2

Citation: 30 TAC Chapter 115, SubChapter B 115.112(a)(2)(A)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 63, Subpart G 63.119(b)(6)

float well cover on external floating roof tank (Tank 26)

Description:

Self Report?

Failure to equip gasket on sample hatch cover and failure to have physical fasteners on

Classification:

Moderate

Rqmt Prov:

**PERMIT 6387, SC 2** OP O-02185, STC 16

OP O-02185, STC 1A

Description:

Failure to cover all the openings on internal floating roof tanks: Tank 37 and Tank 47 and failure to have physical fasteners on float well covers on internal floating roof tanks: Tank

37, 48, and 49.

Self Report?

NO

NO

Classification:

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 40 CFR Part 63, Subpart G 63.119(b)(1)[G] 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

PERMIT 6387, SC 2 OP O-02185, STC 1.A OP O-02185, STC 16

Description:

Failure to keep the floating roof of Tank 47 always in contact with liquid surface during

the regular operations.

Self Report? Citation:

30 TAC Chapter 116, SubChapter B 116.110(a) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

**PERMIT 6387, SC 4 A** OP O-02185, STC 16

Description:

Failure to obtain authorization for the emissions resulted from analyzer vents in the

MTBE Unit

Self Report?

NO

Classification:

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B, 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT 6387, SC 2 OP O-02185, STC 1.A OP O-02185, STC 16

Description:

Failure to cap or plug the sixty-one (61) open-ended lines in VOC service in MTBE Unit.

NO Self Report?

Classification:

Classification:

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

OP O-02185, STC 1.A

Description:

Failure to have required information on tags attached to visual fugitive leaks in the MTBE

Self Report?

NO

Minor

Citation:

30 TAC Chapter 115, SubChapter D 115.352[G] 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122. SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(a)[G]

5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT 6387, SC 5 OP O-02185, STC 1.A OP O-02185 STC 16

Description:

Citation:

Failure to include 2 valves in the MTBE Unit in fugitive monitoring database and comply

with the fugitive monitoring requirements.

NO Self Report?

30 TAC Chapter 115, SubChapter B 115.142[G]

Ramt Prov:

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b) OP O-02185, SC 5

Description:

Failure to control the one wastewater stream (T-1215) as required by 30 TAC 115.142 in

MTBE Unit.

Self Report?

NO

Classification:

Classification:

Minor

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 30 TAC Chapter 122, SubChapter B 122.145(2)(C)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(b)(9)

Rgmt Prov:

**PERMIT 6387, SC 2** OP O-02185, STC 1.A OP O-02185, STC 16

Description:

Failure to make the tank seal inspection (Tank-26) notification 30 days in advance in

MTBE Unit.

Self Report?

Classification:

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b) PERMIT 6387, SC 2 Ramt Prov:

OP O-02185, STC 1.A

OP O-02185, STC 16

Description:

Failure to comply with HON process wastewater provisions for two containers in MTBE

Unit

Date: 06/26/2006

(464019)

Self Report?

Citation:

30 TAC Chapter 319, SubChapter A 319.7(a)[G]

Ramt Prov:

PERMIT 00391-000

Description:

Failure to document the sample collection time and the identify of the sample personnel

for the Outfall 001

24 hour composite samples.

Date: 07/28/2006

(484749)

Self Report?

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c)

Ramt Prov:

5C THC Chapter 382, SubChapter D 382.085(b) PERMIT No. 22779, Special Condition No. 1 Equistar failed to prevent this emissions event

Description: Date: 08/15/2006

(489890)

Self Report?

30 TAC Chapter 335, SubChapter A 335.6(c)

Citation: Description:

Failure to update Notice of Registration

Date: 08/16/2006

(457265)

Self Report?

Classification:

Moderate

Minor

Moderate

Moderate

Citation:

30 TAC Chapter 115, SubChapter C 115.212(a)(1)[G]

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.135(e) 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.152(b) 5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Failure to control emissions from drum D3075 and from tank TK20.

Self Report? NO Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Moderate

Citation:

30 TAC Chapter 115, SubChapter D 115.352(4) 30 TAC Chapter 115, SubChapter H 115.783(5) 30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

**PERMIT 2128, SC 10E** OP O-02184, ST&C 18 OP O-02184, ST&C 1A

Description: Self Report? Failure to cap or plug 174 open ended lines in VOC service.

NO

NO

Classification:

40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.6(e)(3)(i) 5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Citation:

Failure to have a Startup/Shutdown/Malfunction plan to address visible emissions from

east plant flare.

Self Report? Citation:

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.163(b)

5C THC Chapter 382, SubChapter D 382.085(b) OP O-02184, ST&C 1A

Rqmt Prov:

Description:

Failure to conduct monthly monitoring on 4 HON pumps in January 2005.

Self Report?

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.166(a)

OP O-02184, ST&C 1A

Ramt Prov:

Citation:

5C THC Chapter 382, SubChapter D 382.085(b)

Description:

Failure to equip a sample point with a closed loop system on reactor effluent and T1204

overhead.

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter D 115.354(5) 30 TAC Chapter 115, SubChapter H 115.782(a) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

OP O-02184, ST&C 1H

Description:

Failure to have identification numbers on the fugitive leak tags attached to 51

components

Self Report? NO

Moderate

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.110(a)(1) 30 TAC Chapter 122, SubChapter B 122.132(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Description: Self Report? Failure to authorize emissions from sampling in the tank farm. Classification:

Citation:

30 TAC Chapter 115, SubChapter D 115.352(1)[G]

30 TAC Chapter 116, SubChapter B 116.115(c) 30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Ramt Prov:

PERMIT 2128, SC 10 OP O-02184, ST&C 18

OP O-02184, ST&C 1A

Description:

Failure to include 16 pumps, 45 valves, and 292 connectors in the fugitive monitoring

database.

Self Report? Citation:

NO

30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.132(a)

5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

OP O-02184, ST&C 13

Description:

Failure to control emissions from 3 wastewater streams (D-78, D-3055, D-03102).

11/30/2006 (544284)Date:

YES Self Report?

Classification:

Classification:

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 305, SubChapter F 305.125(1) TWC Chapter 26 26.121(a)[G]

Description:

Failure to meet the limit for one or more permit parameter

Date: 02/01/2007

(538420)

Self Report?

Classification:

Moderate

Moderate

Citation:

30 TAC Chapter 116, SubChapter B 116.115(c) 5C THC Chapter 382, SubChapter A 382.085(b)

Ramt Prov:

Description:

PERMIT 2933 Special Condition 1 Failure to prevent process water collection system back-up which resulted in unauthorized emissions.

Date: 04/11/2007 (532608)

Self Report?

30 TAC Chapter 122, SubChapter B 122.132(a)

Citation: Description:

5C THC Chapter 382, SubChapter D 382.085(b) Failure to include Polyols loading emissions in federal operating permit O-02179.

Self Report? NO

Moderate Classification:

30 TAC Chapter 116, SubChapter B 116.115(c) Citation:

30 TAC Chapter 122, SubChapter B 122.143(4) 5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov:

OP FOP O-02179 SC 10

PA NSR 3130A SC 10D

Description:

Failure to load Styrene within the allowable rates in NSR Permit 3130A.

Environmental audits.

Notice of Intent Date:

05/30/2002 (32973)

No DOV Associated

Notice of Intent Date: 06/20/2002 (32977)

No DOV Associated

Notice of Intent Date: 02/03/2003 (33157)

No DOV Associated

Notice of Intent Date:

(453654)

No DOV Associated

Notice of Intent Date:

10/06/2005 (434934)

No DOV Associated

07/26/2005

Notice of Intent Date:

(534269)11/28/2006

No DOV Associated

Type of environmental management systems (EMSs). G.

Voluntary on-site compliance assessment dates. Η.

Participation in a voluntary pollution reduction program.

Early compliance.

N/A

Sites Outside of Texas

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
EQUISTAR CHEMICALS, LP
RN100542281

3	BEFORE THE
3	
•	THE STATE OF THE S

§ § § TEXAS COMMISSION ON

**ENVIRONMENTAL QUALITY** 

## AGREED ORDER **DOCKET NO. 2007-0493-AIR-E**

## I. JURISDICTION AND STIPULATIONS

At its agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Equistar Chemicals, LP ("the Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent appear before the Commission and together stipulate that:

- The Respondent owns and operates a chemical manufacturing plant at 8280 Sheldon Road in 1. Channelview, Harris County, Texas (the "Plant").
- 2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).
- 3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
- 4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about March 4, 2007, March 25, 2007, and April 14, 2007.
- The occurrence of any violation is in dispute and the entry of this Agreed Order shall not 5. constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.
- An administrative penalty in the amount of Two Hundred Twenty-Eight Thousand Seven 6. Hundred Twenty Dollars (\$228,720) is assessed by the Commission in settlement of the violations alleged in the Allegations. The Respondent has paid Ninety-One Thousand Four



Hundred Eighty-Nine Dollars (\$91,489) of the administrative penalty and Forty-Five Thousand Seven Hundred Forty-Two Dollars (\$45,742) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty. Ninety-One Thousand Four Hundred Eighty-Nine Dollars (\$91,489) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project.

- 7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director of the TCEQ and the Respondent have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 9. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:
  - a. By March 29, 2007, retrained employees on oversight of the continuous monitoring recorder on the Methanol Skid (ECULR2MEOH);
  - b. By April 19, 2006, reviewed with its personnel the proper procedures for the daily inspection of the fuel dispensing facilities;
  - c. By October 26, 2006, provided proper emissions control for waste materials and reviewed with its personnel the proper procedures for waste handling;
  - d. By April 19, 2006, reviewed with its personnel the restrictions on engine operating hours;
  - e. By April 19, 2006, reviewed with its personnel the proper record keeping requirements for the start and stop time for diesel engines;
  - f. On January 18, 2006, installed a steam stripper upstream of the ECUABEAST biotreatment unit that eliminated the further need to test the unit for volatile organic compound ("VOC") reduction efficiency;
  - g. By November 19, 2007, in order to address the untimely flare analyzer calibrations conducted on Flares 607 and 1701, resolved calibration gas issues with the supplier;
  - h. On November 14, 2006, provided additional personnel training on the regulatory requirements of open-ended lines in VOC service;
  - i. By March 27, 2006, replaced the open-ended lines discovered on January 12 and March 27, 2006;
  - j. By June 11, 2006, decreased nitrogen flow and reapplied clearing activities at a slower pace in order to maintain the required heat input to the Poly Butadiene unit flare at a value greater than 300 British thermal units per standard cubic foot ("Btu/scf");

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- k. By September 13, 2006, implemented new record keeping practices on a more frequent weekly basis detailing all corrective actions made to the continuous monitoring system for the Poly Butadiene unit flare;
- 1. By June 28, 2006, conducted a multi-point calibration on the Poly Butadiene unit flare analyzer;
- m. On April 16, 2007, submitted an update for Federal Operating Permit ("FOP") O-02177 to include Emission Point Number ("EPN") MPBDM3219;
- n. By October 27, 2005, conducted sampling and gathered information to completely document the VOC water separator exemption criteria;
- o. By February 19, 2006, repaired the leaking valve that had been on the schedule for repair during the December 22, 2005 to February 1, 2006 shutdown;
- p. Revised FOP O-02178 on April 3, 2006, to include Permits by Rule ("PBR") claimed during the year 2000;
- q. Removed the vent condenser on tank TK-2810 and rerouted emissions to the IPOH Flare on April 27, 2007 and authorized those emissions via PBR;
- r. Completed the installation of rupture discs and pressure gauges on three safety relief valves (EPN F28E00) in the Styrene Maleic Anhydride Unit by February 17, 2006;
- s. Submitted a request to the TCEQ on September 20, 2006 to amend New Source Review Permit ("NSRP") 24677 to address emissions and representations for Tote EPN 28E37;
- t. Obtained an alteration to NSRP No. 24677 on December 6, 2005 that allows closed purge cumene sampling;
- u. Provided for additional personnel oversight of Heater MSMHT2801B's fuel flow continuous recorder by September 18, 2006; and
- v. Replaced the filter on Dust Collector EPN28E29 on August 15, 2006.
- 10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

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#### II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have:

- 1. Failed to demonstrate the use of a continuous monitoring recorder on the Methanol Skid (ECULR2MEOH), in violation of FOP O-02181, Special Terms and Conditions ("STC"), 1.A., 30 TEX. ADMIN. CODE §§ 101.20(2) and 122.143(4), 40 CODE OF FEDERAL REGULATIONS ("CFR") § 63.127(b)(2), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent was required to continuously monitor the emissions control device for the Skid with a recorder, but the Respondent reported that the records from July 11, 2005 through September 17, 2005 were discarded.
- 2. Failed to perform daily inspections of the fuel dispensing facilities, in violation of FOP O-02181, STC 6.C.iv., 30 TEX. ADMIN. CODE §§ 115.244 and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that, from March 3 through March 5, 2006, it failed to perform the required daily inspections of the Stage II vapor recovery system for defects.
- 3. Failed to provide proper emissions control for waste material, in violation of FOP O-02181, STC 1.A. and 6.B.ii., 30 Tex. ADMIN. CODE §§ 115.212(a)(3)(A)(ii) and 122.143(4), and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that, twice on February 27, once on August 27, 2006, it placed VOC liquids, residuals from a transport vessel transfer operation, into portable containers that were not vapor-tight.
- 4. Failed to comply with restrictions on engine operating hours in an ozone nonattainment area, in violation of FOP O-02181, STC 1.A. and 7.A., 30 TEX. ADMIN. CODE §§ 117.206(i) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that, on four occasions from October 19 through November 9, 2005, it conducted testing or maintenance on two diesel engines (EUTP803A and EUTP803B) during the restricted hours of 6 a.m. to noon.
- 5. Failed to record the start and stop times of a diesel engine operating in an ozone nonattainment area, in violation of FOP O-02181, STC 1.A. and 7.E., 30 TEX. ADMIN. CODE §§ 117.219(f)(10) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that it failed to record those times on November 17, 2005 for diesel pump EUTEN1.
- 6. Failed to demonstrate VOC reduction efficiency for the ECUABEAST bio-treatment unit, in violation of FOP O-02181, STC 1.A., 30 TEX. ADMIN. CODE § 115.144(4)(A), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, this unit was in operation since 1997, and was required to have its reduction efficiency demonstrated by December 31, 2002, but the Respondent failed to make that demonstration.
- 7. Failed to timely conduct flare analyzer calibrations, in violation of 30 Tex. ADMIN. CODE § 115.725(d)(1) and Tex. Health & Safety Code § 382.085(b), as documented during an

investigation conducted on January 29, 2007. Specifically, the Respondent reported that it was required to perform initial flare analyzer calibrations on Flares 607 and 1701 (highly reactive volatile organic compounds abatement devices) by January 1, 2006, but did not perform those calibrations until June 16, 2006.

- 8. Failed to comply with the requirements of malfunction reporting for the wastewater steam stripper (EUTT8802), in violation of 40 CFR § 63.10(d)(5)(i), TEX. ADMIN. CODE § 101.20(2), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, in its report for the period April 1 to September 30, 2006, the Respondent reported that, on June 25, 2006, and between July 17 and August 7, 2006, seven stripper column malfunctions occurred. However, the Respondent failed to state the cause of the malfunctions and failed to state what actions were taken to minimize emissions.
- 9. Failed to equip open-ended lines with a cap, blind flange, plug, or a second valve, in violation of FOP O-02181, STC 1.A. and 22., NSRP 2128, Special Condition ("SC") 8.E., 30 TEX. ADMIN. CODE §§ 101.20(1), 101.20(2), 115.352(4), 116.115(c), and 122.143(4), 40 CFR §§ 60.482-6(a)(2) and 63.167(a)(1), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that it found the following noncompliant, open-ended lines: one on the main flare header, three on other lines in VOC service, and eight others on lines in hazardous air pollutant service. These were found on November 15, 2005, February 13, 2006, and August 27, 2006, respectively, and all were provided with caps or plugs within a day of their discovery.
- 10. Failed to cap four open-ended lines, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSRP 22779, SC 8.E., FOP O-02177, STC 1.A. and 10., and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation on December 13, 2006. Specifically, the Respondent discovered 3 open-ended lines on January 12, 2006, and 1 open-ended line on March 27, 2006.
- 11. Failed to operate the flare within the required heat input of 300 Btu/scf, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), NSRP 22779, SC 6.A., FOP O-02177, STC 1.A. and 10., and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation on December 13, 2006. Specifically, the heat content of the combusted gas in the Poly Butadiene unit flare fell below 300 Btu/scf for six minutes on November 30, 2005, twenty-two minutes on October 21, 2005, one minute on March 6, 2006, and two minutes on June 11, 2006.
- Failed to report corrective actions within the required time frame, in violation of 30 TEX. ADMIN. CODE §§ 115.726(d)(3) and 122.143(4), FOP O-02177, STC 1.J.(ii), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation on December 13, 2006. Specifically, the Respondent failed to complete Highly Reactive Volatile Organic Compound ("HRVOC") corrective action reports for the Poly Butadiene unit flare within the required time frame on six occasions from March 29 to July 18, 2006.
- 13. Failed to calibrate the Poly Butadiene unit flare analyzer, in violation of 30 Tex. Admin. Code §§ 115.725(d)(2) and 122.143(4), FOP O-02177, STC No. 1J(ii), and Tex. Health & Safety Code § 382.085(b), as documented during an investigation on December 13, 2006. Specifically, the Respondent failed to conduct initial and first quarter multipoint calibration of the flare analyzer for HRVOCs from January 1 to June 28, 2006.

- 14. Failed to obtain authorization for emissions sources and their associated emissions prior to operation, in violation of 30 Tex. ADMIN. CODE § 122.121 and Tex. Health & Safety Code §§ 382.085(b) and 382.054, as documented during an investigation on December 13, 2006. Specifically, EPN MPBDM3219 had been operating but was misrepresented in FOP O-02177 in an incorrect location.
- 15. Failed to comply with permitted emissions limits, in violation of 30 Tex. ADMIN. CODE §§ 116.115(b)(2)(F) and 122.143(4), NSRP 49120, SC 1., FOP O-02177, STC 10., and Tex. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation on December 13, 2006. Specifically, emissions for the year 2005 at the Mid API Separator (EPN 32E06) were 4.6 tons of VOC. The authorized emissions limit for emissions under the permit is 2.2 tons per year.
- 16. Failed to maintain sufficient records to demonstrate continuous compliance with VOC water separator exemption criteria, in violation of 30 Tex. ADMIN. Code §§ 115.136(a)(1) and 122.143(4), FOP O-02177, STC 1.A., and Tex. Health & Safety Code § 382.085(b), as documented during an investigation on December 13, 2006.
- The Respondent failed to repair a leaking valve during a scheduled shutdown, in violation of 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), NSRP 22779, SC 8.I., FOP O-02177, STC 1. A. and 10., and Tex. Health & Safety Code § 382.085(b), as documented during an investigation on December 13, 2006. Specifically, the Respondent failed to make scheduled repairs of a valve during the scheduled shutdown from December 22, 2005 through February 1, 2006.
- Failed to include PBR claims in a FOP, in violation of FOP O-02178, General Terms and Conditions, 30 Tex. Admin. Code § 122.132(a), and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that it failed to include the following Unit ID numbers, authorized under PBR during the year 2000, in its FOP: MSMTK2804A, MSMTK2804B, MSMTK2812, MSMTK2801, MSMTK2803, MSMTK2811, MSMTK2802, MSMDM2801, MSMDM2805, MSMDM2802, MSMTK2824, and MSMFG.
- 19. Exceeded permitted emissions limits for tank TK-2810, in violation of FOP O-02178, STC, 1.A. and 10., NSRP 24677, SC 1., 30 TEX. ADMIN. CODE §§ 115.112(a)(3), 116.115(c), and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the permit limits VOC emissions from that tank to 0.04 pounds per hour ("lbs/hr") and less than 0.01 tons per year ("tpy"), but the Respondent reported the VOC emissions from the tank at 4.2 lbs/hr and 14 tpy since July 15, 2005. In addition, the Respondent reported that it had failed to achieve the required 90% control efficiency on the vent condenser on that tank.
- Failed to install rupture discs and pressure gauges on three safety relief valves (EPN F28E00) in the Styrene Maleic Anhydride Unit, in violation of FOP O-02178, STC 10., NSRP 24677, SC 11.F. and 13., 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), and Tex. Health & Safety Code § 382.085(b), as documented during an investigation conducted on January 29, 2007.
- 21. Failed to accurately represent operating temperatures for tote EPN 28E37 in the permit representations, in violation of FOP O-02178, STC 10., 30 Tex. ADMIN. CODE §§ 116.116(b)(1) and 122.143(4), and Tex. Health & Safety Code § 382.085(b), as documented during an

Equistar Chemicals, LP DOCKET NO. 2007-0493-AIR-E Page 7

investigation conducted on January 29, 2007. Specifically, subsequent to the permit representation of the tote's temperature, the Respondent elected to represent a higher temperature without amending the permit.

- Failed to perform closed loop cumene sampling, in violation of FOP O-02178, STC 10., NSRP 24677, SC 9.C., 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the permit requires closed loop sampling, and on six occasions from July 20, 2005 through December 5, 2005, the Respondent reported it did not perform closed loop sampling.
- 23. Failed to maintain continuous records of fuel flow for Heater MSMHT2801B, in violation of FOP O-02178, STC 1.A., 30 TEX. ADMIN. CODE §§ 117.213(a) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, on April 8 and 9, 2006, the Respondent reported that the record of flow was not kept for fifteen 15-minute periods.
- 24. Failed to prevent visible emissions from Dust Collector EPN28E29, in violation of FOP O-02178, STC 3., 30 TEX. ADMIN. CODE §§ 111.111(a)(1)(B) and 122.143(4), and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during an investigation conducted on January 29, 2007. Specifically, the Respondent reported that the dust collector experienced 100% opacity for approximately ten minutes on August 15, 2006.

#### III. DENIALS

The Respondent generally denies each allegation in the Allegations.

#### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations, which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Equistar Chemicals, LP, Docket No. 2007-0493-AIR-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. The Respondent shall implement and complete a Supplemental Environmental Project ("SEP") in accordance with Tex. Water Code § 7.067. As set forth in Section I above, Ninety-One Thousand Four Hundred Eighty-Nine Dollars (\$91,489) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.
- 3. It is further ordered that the Respondent, shall undertake the following technical requirements:
  - a. Within 30 days after the effective date of this Agreed Order, submit a corrected malfunction report for the seven wastewater steam stripper (EUTT8802) malfunctions that occurred on June 25, 2006, and between July 17 and August 7, 2006;
  - b. Within 30 days after the effective date of this Agreed Order, either obtain authorization to increase emissions from tote EPN 28E37, or cease unauthorized emissions from that tote until such time that appropriate authorization is obtained;
  - c. Within 30 days after the effective date of this Agreed Order, implement improvements to designs, operations, and/or maintenance practices that address the root cause of the failure to control visible emissions from Dust Collector EPN28E29; and
  - d. Within 45 days after the effective date of this Agreed Order, submit written certification as described below, and include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance with Ordering Provision Nos. 3.a. through 3.c. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The certification shall be submitted to:

Order Compliance Team Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copy to:

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Equistar Chemicals, LP DOCKET NO. 2007-0493-AIR-E Page 9

> Air Section, Manager Houston Regional Office Texas Commission on Environmental Quality 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

- 4. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.
- 5. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 6. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 7. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 8. This agreement may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreement may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.
- 9. Under 30 Tex. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

## SIGNATURE PAGE

#### TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission	
For the Executive Director	Date 4 6 2008

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

Denny W. Wisemen

Plant Manager

Name (Printed or typed) Authorized Representative of Equistar Chemicals, LP

**Instructions**: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

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# Attachment A Docket Number: 2007-0493-AIR-E

#### SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent: Equistar Chemicals, LP

Payable Penalty Amount: One Hundred Eighty-Two Thousand Nine Hundred Seventy-

**Eight Dollars (\$182,978)** 

**SEP Amount:** Ninety-One Thousand Four Hundred Eighty-Nine Dollars

(\$91,489)

Type of SEP: Pre-approved

Third-Party Recipient: Houston-Galveston AERCO's Clean Cities/Clean Vehicles

Program

**Location of SEP:** Harris County

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

## 1. Project Description

#### A. Project

The Respondent will contribute to Houston-Galveston AERCO's Clean Cities/Clean Vehicles Program in Harris County. The contribution will be used in accordance with the *Supplemental Environmental Project Agreement between the Houston-Galveston AERCO and the Texas Commission on Environmental Quality*. SEP monies will be used to aid local school districts and area transit agencies in reaching local match requirements mandated by the Federal Highway Administration's ("FHWA") Congestion Mitigation/Air Quality funding program. SEP monies will be disbursed to school districts and transit agencies in need of funding assistance in the Houston-Galveston non-attainment area. Those SEP monies will be used exclusively by the school districts and transit agencies as supplements to meet the local match requirements of the EPA. SEP monies will be used to pay for the cost of replacing older diesel buses with alternative fueled or clean diesel buses. The old buses will be permanently retired and only sold for scrap. The schools and transit agencies will also use the SEP monies to retrofit more buses to reduce emissions. Houston-Galveston AERCO will send the TCEQ verification in the form of paid invoices and other documentation to show that the retrofits were completed. Retrofit technologies include particulate matter traps, diesel particulate matter filters, NOx reduction catalyst technology in combination with diesel particulate filters, and other emission control technologies that are developed and approved by EPA or the California Air Resources Board.

The Respondent certifies that there is no prior commitment to do this project and that it is being performed solely in an effort to settle this enforcement action.

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#### B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions on buses by more than 90% below today's level and reducing hydrocarbons below measurement capability.

## C. Minimum Expenditure

The Respondent shall contribute at least the SEP Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

#### 2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Amount to the Third-Party Recipient. The Respondent shall mail the contribution, with a copy of the Agreed Order, to:

Houston-Galveston Area Council Houston-Galveston AERCO P.O. Box 22777 Houston, Texas 77227-2777

### 3. Records and Reporting

Concurrent with the payment of the SEP Amount, the Respondent shall provide the TCEQ SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division Attention: SEP Coordinator, MC 219 Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

## 4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full payment of the SEP Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Amount.

The check for any amount due shall be made out to "Texas Commission on Environmental Quality" and mailed to:

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Equistar Chemicals, LP Agreed Order - Attachment A

> Texas Commission on Environmental Quality Financial Administration Division, Revenues Attention: Cashier, MC 214 P.O. Box 13088 Austin, Texas 78711-3088

The Respondent shall also mail a copy of the check to the TCEQ SEP Coordinator at the address in Section 3 above.

## 5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

## 6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

## 7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as an SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.